

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 19-cv-17764 (AT) (KHP)

ARLENE DELGADO,

Plaintiff,

vs.

DONALD J. TRUMP FOR PRESIDENT, et al,

Defendants,

-----/

LOCATION: Remote Audio-Video Communication

DATE: February 8, 2024

TIME: 10:00 a.m. - 2:05 p.m.

DEPOSITION OF REINCE PRIEBUS

Taken before Elena Robaina, Florida  
Professional Reporter, Notary Public in and for the  
State of Florida at Large, pursuant to Notice of  
Taking Deposition filed in the above case.



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

APPEARANCES VIA ZOOM VIDEO CONFERENCE:

## ON BEHALF OF THE PLAINTIFF:

ARLENE DELGADO, PRO SE  
136 SW 33 Avenue  
Miami, Fl 33135  
E-mail: ADelgado@outlook.com

## ON BEHALF OF THE DEFENDANT:

LA ROCCA HORNIK ROSEN & GREENBERG LLP  
40 Wall St FL 32  
New York, NY 10005-1476  
BY: JARED E. BLUMETTI, ESQ.  
E-mail: JBlumetti@LHRGB.COM

I N D E X

## E X A M I N A T I O N S

REINCE PRIEBUS

DIRECT

BY MS. DELGADO 4

EXHIBITS FOR IDENTIFICATIONPLAINTIFF'SPAGE

No. 1	Miller Deposition Transcript	42
No. 2	12/8/16 E-mail	42
No. 3	December 23rd, 2016 e-mail	56
No. 4	April 2019 Memorandum from Congressional House Committee on Oversight and Reform	96
No. 5	Grisham Mugshot Article Screenshot	106
No. 6	3/10/17 Smoking Gun Article screenshot	109
No. 7	Slate 2018 Rob Porter Headline	117
No. 8	Article - Rob Porter - Colbie - black eye	119
No. 9	Photo in the West Wing	120
No. 10	Book page screenshot	134
No. 11	May 19th, 2016 article	143

No Defense Exhibits marked.



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

QUESTION TO CERTIFY:

Page 58 Line 7-8:

Q. So what were your discussions with  
Mr. Drieband and/or with Mr. McGahn?

\* \* \* \* \*



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

(Pursuant to the stipulation of the parties, the oath to be administered by me here today will have the same force and effect as if it were given to the witness while he was physically present before me in the State of Florida and I were acting in my capacity as a Florida Notary.)

Thereupon:

REINCE PRIEBUS

was called as a witness and, having been first duly sworn, was examined and testified as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MS. DELGADO:

**Q.** Good morning, Mr. Priebus.

**A.** Good morning.

**Q.** My name is Arlene Delgado. As you know, I'm the plaintiff in this matter, and I just wanted to go over some ground rules that are standard in any deposition. Have you been deposed before?

**A.** Not that I -- I don't think so.

**Q.** Okay. Well, they are pretty much the same in all, but we'll go over them anyway. Basically, we're going to go over questions and answers. If you don't understand any question that I pose, please, by all means, tell me and I'll try to rephrase it.

If you need to take a break, restroom,



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

1 you need to make a call, want to go get some water,  
2 by all means tell me. We're definitely going to  
3 take one break when we're 90 minutes in, around  
4 11:30, just to place a call to my son's school.  
5 But any other bathroom breaks you need, whatever,  
6 please feel free to speak up. And I think that's  
7 it.

8 And you understand you're under oath and  
9 you need to give truthful answers under penalty of  
10 perjury? I assume that's clear.

11 A. Yes.

12 Q. Wonderful.

13 And if you could answer just as you did  
14 right now, perfect, with a clear "yes" or "no" when  
15 appropriate, when you wish to answer yes or no  
16 versus uh-huh or uh-uh, just for the court  
17 reporter. We should also try not to talk over each  
18 other.

19 Also, if your attorney objects, let him  
20 put his objection on the record. And then usually,  
21 if appropriate, he will tell you, you can then  
22 answer. But just for ease of the court reporter's  
23 job, we all need to give each other time. So if I  
24 interrupt you for any reason, also let me know so  
25 that I don't do that.



1 MS. DELGADO: Okay. Mr. Blumetti, if  
2 there's any other ground rule you wanted to put  
3 in, I have no...

4 MR. BLUMETTI: Nothing from me. I'm  
5 ready to start.

6 MS. DELGADO: Okay. Wonderful.

7 BY MS. DELGADO:

8 Q. Okay. So if you could please state your  
9 name and address, Mr. Priebus.

10 A. Sure.

11 Official name Reinhold Richard Priebus  
12 with [REDACTED]

13 [REDACTED]

14 Q. Wonderful.

15 And what is your current occupation and  
16 place of employment, please?

17 A. I'm an attorney at a law firm by the  
18 name of Michael Best and Friedrich.

19 Q. Does that firm do any work presently or  
20 in the past seven years for the Donald Trump  
21 campaign or any affiliates, family members, so  
22 forth for Mr. Trump?

23 A. I think several years ago one of the  
24 partners did some work for the Trump organization,  
25 but that was many years ago.



1 Q. Okay. And is it correct -- I read this  
2 somewhere, you can correct me if it's wrong, is it  
3 correct that Mr. Trump nominated you back in 2020  
4 for I believe it was some sort of fellowship role?  
5 Could you tell me about that?

6 A. I served on the White House fellows  
7 board for about a year and a half.

8 Q. And when was that?

9 A. It would have been around 2020 to 2021.

10 Q. Okay.

11 A. Wait.

12 Q. So you heard me --

13 A. It would have been 2020 to inauguration  
14 of President Biden.

15 Q. Great. Wonderful. Okay.

16 So you remain on good terms with  
17 President Trump even past your White House  
18 departure in 2017; is that correct?

19 MR. BLUMETTI: Object to the form.

20 THE WITNESS: I would say that's true.

21 BY MS. DELGADO:

22 Q. Okay. And do you consider yourself a  
23 current supporter of President Trump?

24 A. Yes.

25 Q. Okay. You're the host -- you're on the



1 hosting committee, right? You're the head of the  
2 hosting committee for the Republican National  
3 Convention in July; is that correct?

4 A. Yes.

5 Q. Okay. Wonderful.

6 And there's also been some chatter and  
7 reports that you're considering running for office;  
8 is that correct?

9 MR. BLUMETTI: Object to the form.

10 THE WITNESS: No.

11 BY MS. DELGADO:

12 Q. You are -- you currently have not had  
13 any discussions now or in the past year or two with  
14 anyone about potentially running for Republican  
15 office?

16 MR. BLUMETTI: Objection to form.

17 BY MS. DELGADO:

18 Q. Okay. I'll rephrase it.

19 Have you had any discussions in the past  
20 year or two with anyone about running for office?

21 A. There was some minor chatter about me  
22 running for governor of Wisconsin, which lasted  
23 about 15 minutes. That's about it.

24 Q. Why did it last only 15 minutes?

25 A. Because I'm --





1 Q. Are you not --

2 A. Number one, I'm not interested; number  
3 two, I don't live in Wisconsin and it wouldn't be  
4 good timing.

5 Q. Do you have any interest in running for  
6 any other type of office in another state, for  
7 instance, or any type of Republican office?

8 A. Not at this time.

9 Q. If you were to have an interest at a  
10 future point in time, would an endorsement from  
11 Donald Trump be helpful?

12 MR. BLUMETTI: Form.

13 THE WITNESS: I think it depends on the  
14 circumstances.

15 BY MS. DELGADO:

16 Q. What circumstances?

17 A. Well, I mean, it depends where you're  
18 running. I mean, I don't have any plans of running  
19 for office in the future, so what state are you  
20 talking about? I don't know. I don't know. It  
21 depends -- well, you know that. I mean, it depends  
22 on where you're running. Sometimes it's great.  
23 You know, sometimes it wouldn't be. It depends on  
24 where you're at.

25 Q. Well, fair enough. Fair enough.



1 Okay. Have you read over your  
2 co-defendant Sean Spicer's deposition?

3 A. No.

4 Q. And Mr. Blumetti, who's here with us  
5 today, the lawyer for the Trump campaign, is  
6 clearly representing you in this matter. Have you  
7 been charged for Mr. Blumetti's representation or  
8 paid anything for that representation?

9 A. No.

10 Q. So to be clear, it's being done free of  
11 charge to you?

12 A. Right.

13 Q. Okay. And why are you represented by  
14 the lawyer for the Trump campaign free of charge if  
15 you worked for the RNC?

16 A. I guess because my -- the work that I  
17 was doing at that time was originally part of the  
18 transition, the RNC, you know, and it was  
19 determined that the campaign would cover it.

20 Q. When was that determined?

21 A. I couldn't tell you. Maybe four or five  
22 years ago.

23 Q. So would it be accurate to say that  
24 around the time this lawsuit was filed that is when  
25 it was determined that your representation would be



1 covered?

2           **A.** Yeah. I don't really know what and when  
3 all those decisions were made or what the reasons  
4 were for those decisions, but that's what was done.

5           **Q.** And that segues us nicely then into if  
6 you could tell me a bit about your role in the  
7 2015-2016 election, primaries and general.

8           **A.** Yeah, I was chairman of the Republican  
9 National Committee at that time, so I was in charge  
10 of obviously running the committee, raising money  
11 for the committee, conducting the nomination  
12 process, handling a debate schedule, organizing and  
13 overseeing a field operation to get out the vote  
14 effort for our party, and organizational work at  
15 the national level for all activities involving the  
16 Republican party.

17           **Q.** And would it be accurate to say,  
18 thinking back on that primary, that it was a  
19 particularly -- would you describe it -- would it  
20 be accurate to describe it as a particularly  
21 contentious primary among the GOP?

22           **A.** I would -- I would agree with that.

23           **Q.** Have you ever seen one before or after  
24 as contentious?

25           **A.** Well, perhaps the Barack Obama-Hillary



1 Clinton race that went to the end of June, you  
2 know, 2008. You know, 2012 wasn't really a picnic,  
3 I would say. So, you know, with Mitt Romney and  
4 John McCain and Pawlenty and all the rest. So I  
5 mean, we -- we've been building up to contentious  
6 primaries I think in our party, but I would agree  
7 that it was a contentious primary.

8 Q. In the others that you mentioned, had  
9 you ever seen a primary that had so many in the  
10 forefront of the Republican party? And by that I  
11 mean well-known activists, well-known writers,  
12 well-known politicians within the party who were  
13 openly hostile to the frontrunner.

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: Maybe.

16 BY MS. DELGADO:

17 Q. Such as? Which one are you thinking?

18 A. I didn't understand. Are you ask --  
19 what are you asking?

20 Q. I'll rephrase it. Absolutely, I'll  
21 rephrase it. That was a long question.

22 Have you seen any other primary in which  
23 there was such hostility towards the frontrunner,  
24 who throughout most of the primary was Donald  
25 Trump, within the GOP itself, including individuals



1 at the forefront of the GOP and well-known  
2 individuals?

3 A. I thought the people running in 2016  
4 treated -- they actually avoided confronting Donald  
5 Trump for the most part until the very end and it  
6 was too late.

7 Q. Right. I don't mean his fellow  
8 candidates. I mean well-known writers, well-known  
9 politicians who were not writing, activists. Had  
10 you seen any other primary where there was such  
11 hostility and opposition within the party itself to  
12 what was throughout most of the primary the  
13 frontrunner?

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: I would concede that there  
16 was plenty of hostility from writers and others  
17 that opposed Donald Trump.

18 BY MS. DELGADO:

19 Q. Okay. Fair enough.

20 Can you recall some especially since you  
21 were in the thick of all this, can you recall some  
22 big name or well-known writers, pundits, for  
23 instance, Fox News pundits, activists who were  
24 pro-Trump during the primary?

25 A. Fox News, I don't know, maybe Steve



1 Moore, Kudlow, Sean Hannity, Lou Dobbs. I mean, I  
2 think ultimately once he became the nominee it was  
3 pretty positive.

4 Q. Uh-hmm. And when did you find out that  
5 you would be chief of staff in the White House?

6 A. I believe it would have been like maybe  
7 just before mid-November. I don't remember the  
8 date, but it would have been maybe a week or ten  
9 days after the actual election day.

10 Q. Okay. And could you describe the chief  
11 of staff role for me?

12 A. Well, traditionally it would be the  
13 person that assists the President in running the  
14 White House, decision-making, the flow of  
15 information, point of contact for the President.  
16 That's how I would describe it.

17 Q. Would you agree that selection of White  
18 House personnel, particularly senior White House  
19 personnel, is one of the chief duties of the chief  
20 of staff?

21 A. I think it's one of the -- I think it's  
22 one of them. But it's not -- certainly not  
23 everything that the chief of staff is responsible  
24 for.

25 Q. Sure.



1 And there's a book by Chris Whipple, I'm  
2 not sure if you're familiar with it, it's called  
3 "Big Gatekeepers," and it's about the White House  
4 chief of staff role. It was written in 2017 while  
5 you were chief of staff. And in the top one he  
6 lists, among others, as you say, is, "Selecting  
7 senior White House staffers." So you agree that  
8 that's one -- not the only but one of the duties?

9 A. I think you have some influence in the  
10 process.

11 Q. How long were you in the role?

12 A. Six months.

13 Q. And I know it will be hard to remember  
14 everyone, so I'm not asking you to list everyone,  
15 but off the top of your head, can you give me the  
16 names of some of the individuals you did select for  
17 hiring?

18 MR. BLUMETTI: Objection to form.

19 THE WITNESS: I would say my immediate  
20 staff around me I had, for the most part, it was  
21 a decision made by the transition team, and  
22 whoever was in particular departments that chose  
23 their staff.

24 And, of course, I was -- my co-equal was  
25 Steve Bannon as well, so I didn't -- I didn't



1 have the role of a traditional chief of staff as  
2 you know.

3 BY MS. DELGADO:

4 Q. What do you mean by "as you know"?

5 A. Well, I mean, you -- I'm certain that I  
6 think a lot of people saw that when I was named  
7 chief of staff, I was named as a co-equal with  
8 Steve Bannon, which was fairly unusual.

9 Q. And you stated earlier that you hired  
10 those around you. Do you remember those names, at  
11 least some of them?

12 MR. BLUMETTI: Objection, form.

13 THE WITNESS: Yeah, like my immediate  
14 assistant Mallory Hunter, another assistant of  
15 mine by the name of Mike Ambrosini. The two  
16 people that worked right outside of my office, I  
17 would say every -- the others were sort of group  
18 decisions that were made.

19 BY MS. DELGADO:

20 Q. When you say "group decisions that were  
21 made," who was in that group making the decisions?

22 A. Well, I mean, there are a lot of people  
23 involved in the transition when decisions on hiring  
24 were being made in pretty large meetings that we  
25 would have during the transition. Mike Pence was





1 the chair of the transition. Steve Bannon  
2 obviously was involved in the transition. Jared  
3 Kushner was involved in the transition. Marc Short  
4 was involved in the transition.

5 I can't remember everyone, but there's  
6 probably ten to 12. Rick Dearborn, Bill Hagerty.  
7 It was a big group of people.

8 Q. And as incoming chief of staff, given  
9 that you would have been named chief of staff, as  
10 you referenced earlier, by that point, are you  
11 saying your ability to select someone for hiring  
12 was the same as that of say Rick Dearborn?

13 A. Rick Dearborn had a very big role on who  
14 the personnel were going to be during the  
15 transition. Like he was sort of functioning as  
16 a -- I don't remember his role, quite frankly, but  
17 if I had to describe it, I'd say like an executive  
18 director of the transition.

19 Q. And you mentioned Jared Kushner or your  
20 co-defendant Sean mentioned his name specifically  
21 and said he was involved a great deal in hiring  
22 decisions. Would you agree with that?

23 MR. BLUMETTI: Object to form.

24 THE WITNESS: Yeah, he had a big voice  
25 in decisions like that, I would say.



1 BY MS. DELGADO:

2 Q. Was there a particular person of either  
3 Rick or Jared or the ones coming to mind in this  
4 group that maybe focused more on West Wing jobs  
5 versus general administration and agency jobs?

6 A. I would say that the -- sort of the  
7 heads of big departments were in charge of deciding  
8 who was going to work in their departments, and for  
9 the most part, it was -- I would say it was pretty  
10 well siloed that way.

11 Q. Are there a lot of departments, for  
12 instance, policy jobs -- I see what you mean in  
13 terms of that might be easy to peg for press or  
14 comms, but what about policy jobs or individuals  
15 who had titles such as special assistant to the  
16 President, is there a head of that?

17 A. No, I would say, for example, to make it  
18 easy to describe, like, you know, if Don McGahn --  
19 you know, I'm -- I would be more involved in  
20 bringing options to the President, for example, of  
21 who would be White House counsel, you know, the  
22 very top job.

23 And we would bring options to the  
24 President, he'd interview those options. Folks  
25 would potentially tell the President what they --



1 you know, how they viewed the candidates. And then  
2 the President would make a decision.

3 And then someone like Don McGahn would  
4 fill out his, you know, his team and say here's  
5 the -- here are the people we need in order for me  
6 to fulfill my team. And I would say that would be  
7 the way it would have been in every department.

8 So like in policy, you know, Gary Cohn,  
9 you know, when we were trying to figure out who  
10 would be the head of NEC, we bring in some options  
11 to the President, the President makes a decision,  
12 Gary Cohn brings in who he wants. Stephen Miller  
13 at DPC brings in who he wants. Sean Spicer brings  
14 in who he wants. And Jared and Ivanka brought in  
15 who they wanted.

16 So it wasn't -- there was  
17 decision-making more at the top and then from there  
18 the slots got filled. And we were, as you may have  
19 read, fairly behind. So I would say that, you  
20 know, the focus was really at the top cabinet, top  
21 White House spots, getting things put together and  
22 getting ready for January '20.

23 Q. Why were you fairly behind?

24 A. Well, I think when the transition came  
25 about, Chris Christie was in charge of the



1 transition, Chris Christie got relieved of his  
2 duties, and I would say that we started pretty well  
3 from scratch.

4 Q. Would it be accurate to say part of that  
5 was because there was little belief, particularly  
6 among the RNC, that Trump would win?

7 A. No.

8 Q. Let's go back, if I may circle back. I  
9 jotted down some of the names you mentioned to  
10 those you hired. You mentioned Mallory Hunter,  
11 Mike Ambrosini, and, quote, two people right  
12 outside of my office. Can you talk to me about the  
13 qualification for Mallory, Mike, and the two  
14 individuals outside your office, please?

15 A. They worked for me for several years at  
16 the RNC, and Mallory headed up my fund raising and  
17 events and some scheduling matters, and Mike  
18 Ambrosini was my personal assistant for probably  
19 four years before then.

20 Q. Would Ms. Hunter be working on fund  
21 raising at the White House?

22 A. No. I just gotten to know her, and she  
23 and I spent a lot of time together, and I needed  
24 someone to help keep me organized in my role as  
25 chief of staff, and that's what she did outside of



1 my office.

2 Q. And you also hired Katie Walsh, correct?

3 A. Well, I didn't -- it wasn't just my  
4 decision. Obviously, I had to talk to the group  
5 about it, and particularly Jared and Steve. And  
6 Steve had been working with Katie for a couple  
7 months before the transition, and, of course, I had  
8 to talk to the President about it as well.

9 Q. Why did you have to talk about that  
10 selection and not say Mallory and Mike's?

11 A. Because it was a much bigger role. I  
12 mean, deputy chief of staff of the White House is  
13 a -- is a role that is -- you know, was sort of the  
14 number two of the White House staff, and it's not  
15 something I could just declare to be done without  
16 making sure that everybody agreed with it.

17 Q. And Katie Walsh, if I recall correctly,  
18 was a fund raising director at the RNC during the  
19 elections?

20 A. She was chief of staff of the RNC.

21 Q. Also in charge of fund raising?

22 A. Two years before she was chief of staff  
23 she was director of fund raising at the RNC.

24 Q. Were you aware of the discussions and  
25 reports and concerns about Ms. Walsh not being



1 particularly supportive of the then president but  
2 at the time candidate Mr. Trump during the  
3 primaries?

4 A. I don't know if there were those -- I  
5 don't know if there were such reports of that.

6 Q. Did you ever hear any discussions or  
7 concerns raised about that?

8 A. Not during the primaries, no.

9 Q. No, once Mr. Trump won and subsequent to  
10 Mr. Trump winning, did you hear any concerns about  
11 Katie Walsh not having been particularly supportive  
12 of the President as a candidate or as a person  
13 during the primaries?

14 A. No.

15 Q. And how long was she at the White House?

16 A. Three months.

17 Q. Why only three months?

18 A. She just decided that she couldn't --  
19 she didn't -- she didn't particularly like the  
20 setup in the White House and didn't feel like it  
21 was effective. Didn't think that she felt like she  
22 was effective and was a lot of stress, and she  
23 decided to leave, is my best recollection.

24 Q. Were you aware of reports that she was  
25 asked to leave or left due to allegations of



1 leaking to the press?

2 A. I was aware of blog posts that made that  
3 accusation. I was -- I'm aware of those blog  
4 posts, yes.

5 Q. We can -- so you're saying there were  
6 only blog posts, not -- what do you consider a  
7 blog? I'm sorry.

8 A. I don't -- I don't know what they were.  
9 I mean, they were reports. I don't know what kind  
10 of reports. I certainly know there was some blog  
11 reports that said that, yes.

12 Q. Do you consider, for instance, Politico,  
13 a blog?

14 A. No.

15 Q. Okay. So I might have an exhibit or two  
16 to show you about that, but we'll circle back. Im  
17 trying to not do the dual devices just yet.

18 And when Katie left after only three  
19 months at the White House, I believe she went to  
20 the (c)(4), correct, of the America First P.A.C.T.;  
21 is that correct?

22 A. I believe so. I think that's what was  
23 reported. I don't really know a hundred percent.

24 Q. And she was a top position at the  
25 P.A.C.T., if I recall; is that correct?

1 A. I don't know.

2 Q. Okay.

3 A. It could be. You might be right. I  
4 just don't remember. It was something in the  
5 P.A.C.T.. I just don't know what it was.

6 Q. And would you say that's a position that  
7 was facilitated by the fact that she served in the  
8 White House; is that correct?

9 MR. BLUMETTI: Objection to form.

10 THE WITNESS: It may have not been the  
11 White House. It may have been that she was  
12 chief of staff of the RNC. It may have been  
13 because some people liked the work she did and  
14 wanted her to be involved. I don't know who or  
15 why or what the reasoning was for all of that  
16 other than I believe you're right, she would go  
17 to them in some position.

18 BY MS. DELGADO:

19 Q. Did anyone go from the RNC, that you can  
20 think of, to the P.A.C.T.?

21 A. I don't remember. I'm sure there were,  
22 but I don't remember.

23 Q. Okay. Let's talk some more about the  
24 hiring situation. Would you agree that there was a  
25 girth or a scarcity of suitable candidates given





1 the amount of opposition that Mr. Trump had  
2 received within well known individuals in the GOP?

3 MR. BLUMETTI: Objection to form.

4 THE WITNESS: I would say no. I'd say  
5 the opposite. I thought that there were --  
6 there was no shortage from my standpoint.

7 BY MS. DELGADO:

8 Q. Who is Rob Porter?

9 A. Rob Porter was the staff secretary who  
10 came from Senator Hatch's office.

11 Q. Okay. And who made the decision to hire  
12 him?

13 A. I don't remember.

14 Q. Did Mr. Trump have a say in most of the  
15 West Wing hires?

16 MR. BLUMETTI: Form.

17 THE WITNESS: I would say that the big  
18 West Wing hires, yes.

19 BY MS. DELGADO:

20 Q. And I'm sorry, if you could clarify what  
21 you mean by "big." Do you mean senior level roles,  
22 deputy assistant, et cetera, and not so much  
23 administrative?

24 A. I'd say -- sorry. I'd say generally on  
25 the main department heads, yes, and occasional

1 folks that may not be department heads but people  
2 that for whatever reason had his ear and he made it  
3 known that there were a couple people that he -- he  
4 advocated for.

5 Q. Who are those; do you recall?

6 A. Which ones?

7 Q. When you say that "he advocated for,"  
8 people he advocated for.

9 A. You mean outside of the department  
10 heads?

11 Q. Correct.

12 A. Let me see two and -- Omarosa was one  
13 and Rudy Giuliani's son was one that wouldn't be  
14 department heads, but he chimed in on it. I don't  
15 remember all these things. You know, you have to  
16 understand this is like eight years ago.

17 Q. Of course.

18 A. And I do a thousand things, but that's  
19 the general gist of it.

20 Q. And what would be the reason for  
21 Mr. Trump or did Mr. Trump give a reason or do you  
22 have an opinion as to the reason that he pushed for  
23 Omarosa to be hired?

24 A. I don't remember. I don't know.

25 Q. From your vantage point, what were



1 Omarosa's qualifications for a White House job?

2 A. Outward facing, outgoing. I don't  
3 really know her that well, so I couldn't tell you.

4 Q. Yeah, and I'm sorry, I don't mean  
5 personality-wise. I mean, given her background,  
6 her career, what were her qualifications? Because  
7 she's a celebrity, so I assume you know something  
8 about her. If I may ask, based on what you knew of  
9 her career, when you heard she was appointed, what  
10 would be her qualifications?

11 MR. BLUMETTI: Object to form.

12 THE WITNESS: She was at the time a  
13 personal friend of the President. She had, you  
14 know, history apparently from being on The  
15 Apprentice with him and other events, and that  
16 was the extent that I knew.

17 BY MS. DELGADO:

18 Q. And Rudy's son, same question.

19 A. Apparently going to be involved in  
20 outreach through Office of Public Liaison and  
21 working with groups around the country, and he'd  
22 focus on a lot of sports groups and sporting and  
23 schools in regard to sports, which was his  
24 background. And it was a person that I can  
25 remember that the President mentioned to me.



1 Q. Right. And I'm sorry, I didn't -- if I  
2 wasn't clear, I wasn't asking what his role was  
3 going to be.

4 What were his qualifications? Because I  
5 assume given that you said you had so many great  
6 applicants, I assume, for outreach, for sports, or  
7 what you just mentioned, you could have many  
8 different candidates. So what were Rudy's son's  
9 qualifications?

10 MR. BLUMETTI: Objection.

11 BY MS. DELGADO:

12 Q. Okay.

13 A. I don't know. I mean, I didn't -- I  
14 didn't personally hire any -- either of these  
15 people. It was just -- you asked me when do I  
16 remember the President chiming in on particular  
17 people and those are two particular people I  
18 remember and, of course, the department heads.

19 Q. Right.

20 And the question was, from your vantage  
21 point, being chief of staff, what, in your opinion,  
22 were their qualifications? But I think you  
23 answered that you don't know what their  
24 qualifications were.

25 A. Well, the qualifications would be,



1 there's a role that they -- that was going to be  
2 filled, and they were going to fill it, and they  
3 had qualifications to fill it.

4 Q. What were those qualifications?

5 A. I just told you.

6 Q. I don't think I heard them for Rudy's  
7 son. I think for Omarosa you mentioned she was,  
8 quote, outward facing and outgoing and a personal  
9 friend of the President. And for Rudy's son, I  
10 believe you spoke about what his role would be, but  
11 what were his qualifications to work in the White  
12 House?

13 A. I don't remember. It was eight years  
14 ago. I just don't remember what they were.

15 Q. That's fine. Fair enough.

16 And -- and do you recall -- and I can  
17 flash it up on the screen or if it's okay, I can  
18 just quote it -- there was a Washington Post  
19 article in August of 2018 where Mr. Trump is  
20 discussing Jeff Sessions, who by then had departed  
21 from his attorney general role, and Mr. Trump says,  
22 "The only reason I gave him the job was because I  
23 felt loyalty. He was an original supporter."

24 Will you agree that loyalty and being a  
25 supporter based on that quote was a big



1 qualification for a White House job?

2 MR. BLUMETTI: Objection to form.

3 THE WITNESS: In some cases.

4 BY MS. DELGADO:

5 Q. In some cases.

6 Do you recall when Jeff Sessions came  
7 out in favor of Donald Trump?

8 A. I don't remember when. I know he was  
9 early and one of the first senators to do that.

10 Q. Okay. I can throw it up on the screen,  
11 make it easier. Let me just throw it up on the  
12 screen here. Let's see. In the chat, if everybody  
13 can see the chat.

14 (Sharing screen.)

15 BY MS. DELGADO:

16 Q. Okay. I placed in the chat, if you  
17 could see it, Mr. Priebus, an article I wrote  
18 advocating for Mr. Trump.

19 Can you tell me the date on that  
20 article?

21 A. I can't see it.

22 Q. Okay. Are you able to see the chat?

23 A. No.

24 Q. Okay.

25 A. It was up there, but -- the link was up



1 there for a second, but it's gone now.

2 Q. Okay. All right. I'm resending it.

3 A. I see the link, but I don't see anything  
4 else.

5 Q. Are you able to click on the link?

6 A. It's not there anymore.

7 (Off-the-record discussion.)

8 BY MS. DELGADO:

9 Q. Let me put it up on my screen and then  
10 I'm going to share the screen.

11 (Sharing screen.)

12 BY MS. DELGADO:

13 Q. So I wrote, entitled, "20 Reasons Why It  
14 Should Be Donald Trump in 2016."

15 A. I believe you.

16 Q. Okay.

17 A. I mean, I believe you. I mean...

18 Q. Okay.

19 MS. DELGADO: If not, Mr. Blumetti, you  
20 can let me know if you object to my  
21 representation of this article, and the date is  
22 October 22nd, 2015.

23 A. Okay.

24 Q. Would you say that's an early supporter?

25 MR. BLUMETTI: Objection to form.



1 THE WITNESS: October of 2015?

2 BY MS. DELGADO:

3 Q. Yes.

4 A. I don't know.

5 Q. Would it help if I showed you -- since  
6 you said Jeff Sessions was, would it help if I  
7 showed you when Jeff Sessions endorsed Mr. Trump?

8 A. So you can just tell me or remind me.  
9 It's just as easy.

10 Q. Okay. It was in February of 2016.

11 A. Okay.

12 Q. So do you consider October 2015 an early  
13 supporter --

14 A. Well, I mean, I think -- I think it's  
15 totally different. I mean, I think Jeff Sessions  
16 is a United States senator. It's a primary.  
17 There's hesitation among elected officials whether  
18 to endorse or not, but I do think the President had  
19 a lot of staff during the fall of 2015 on his  
20 campaign. So, you know, I think it's just a -- I  
21 think they are a little bit different.

22 But I haven't compared, you know, a  
23 timeline as far as all the different people  
24 involved and when they came out. I don't  
25 particularly object to your statement, but as to





1 who was early and compared to everyone else, I  
2 don't know. I just never studied it.

3 Q. Do you know if the White House hired  
4 anyone who was pregnant at the time?

5 A. I have no idea. Wait, wait --

6 Q. So --

7 A. Wait, wait. When are you -- sorry.  
8 What timeline are you asking about?

9 Q. From the time Mr. Trump won the election  
10 to inauguration or even through your tenure in  
11 July 2017. So from November 2016 after Trump won  
12 to July 2017, are you aware of any individual, any  
13 woman who was pregnant who was hired?

14 A. I wouldn't know who was -- I wouldn't  
15 know. I mean, that's not something I would ask. I  
16 mean, I just wouldn't think about it.

17 Q. Right.

18 Just to be clear, my question isn't did  
19 the White House hire anyone, because I know you  
20 wouldn't necessarily know.

21 A. Okay.

22 Q. It's, are you aware of any?

23 A. I can't remember. I don't -- I'm not  
24 aware of it as I sit here now. But I don't  
25 remember what I knew eight years ago.



1 Q. So as you sit here now, you can't recall  
2 anyone who was pregnant and hired?

3 A. Not that I knew of.

4 Q. I'm sorry. Go ahead.

5 A. Not that -- not that I knew of, but I  
6 don't remember everything I knew then as I sit here  
7 now.

8 Q. Sure. Fair enough.

9 Okay. And by the way, if I look down  
10 while you're answering, I am paying attention to  
11 your answers. I don't mean just to come across as  
12 disrespectful, I'm just taking notes while you give  
13 your answers, so please don't take any offense if  
14 I'm not looking at the screen.

15 A. No problem.

16 Q. So -- and if I jump around from topic to  
17 topic, also please excuse me. It's not deliberate.  
18 It's just the way my mind works.

19 A. Understood.

20 Q. Okay. So there is a deposition  
21 transcript that I wanted to show you, but Zoom is  
22 such a tricky fellow, we might have to come back to  
23 that. I'll show the excerpt later. But if  
24 Mr. Blumetti has no objection, I can just read off  
25 it.



1 MS. DELGADO: It was produced in  
2 production, Mr. Blumetti. I'm referencing  
3 Mr. Miller's deposition from December 1st, 2017.  
4 Do you have any objection to my just reading off  
5 of it?

6 MR. BLUMETTI: Are you able to share the  
7 screen so the witness could see it?

8 MS. DELGADO: Yeah. I'm trying, and for  
9 some reason that other one...

10 If you want to grab some water now while  
11 I figure this out, feel free. Maybe we could  
12 take a quick break for technical difficulties.

13 THE WITNESS: No problem.

14 MS. DELGADO: Okay. Okay. I want to  
15 make sure I'm able to show it to Mr. Priebus  
16 while I ask.

17 (Off the record.)

18 MS. DELGADO: Back on the record.

19 (Sharing screen.)

20 BY MS. DELGADO:

21 Q. Okay. Back on the record. Okay.  
22 Mr. Priebus, so what I'm showing here is a  
23 deposition that Jason Miller gave in 2017, so just  
24 a few months after the time period we're discussing  
25 in this case. And I'd like for you to read for



1       yourself or I can read aloud and you can follow  
2       along where it starts line 2, "So since..." Do you  
3       see that?

4               **A.** Yes.

5               **Q.** Okay. So I'm just going to read it into  
6       the record. So that's Miller speaking and he says,  
7       "So since there still seemed to be some interest  
8       from her end in possibly doing the White House, I  
9       made sure that the draft org chart at least existed  
10      up until I was removed from decision making, that  
11      she was on there and had a spot."

12              And then further down he says (as read):  
13      I spoke with -- I mean, there were a couple of  
14      folks who kind of -- I don't know if counterpart is  
15      the proper phrasing, but the other kind of  
16      co-leader of the communications team who then ended  
17      up going into the White House, Sean Spicer, he was  
18      the other person, I guess the decision making  
19      person, who I discussed it with. And then after I  
20      basically had all the decision making removed from  
21      me, that fell to him. End of quotation.

22              Is that accurate? Did I read that  
23      correctly?

24              **A.** Yes. Okay.

25              **Q.** So Jason Miller represented that I was



1 on the org chart at the time he was removed from  
2 decision making.

3 When was I removed?

4 MR. BLUMETTI: Form.

5 THE WITNESS: I don't know if you were  
6 on the org chart or not. I never saw that org  
7 chart or I never saw the org chart, and if I  
8 did, I didn't study it, and I'm not quite sure  
9 what chart he's referring to in that deposition.  
10 I don't know what chart he's talking about.

11 BY MS. DELGADO:

12 Q. Well, earlier you testified that the  
13 head of each group -- and Mr. Miller had been named  
14 comms director or was in the running at the time he  
15 would have put in this org chart for such. Earlier  
16 you testified that certain department heads would  
17 put together their teams and bring in those names.  
18 It sounded like what you were describing was an org  
19 chart, no?

20 MR. BLUMETTI: Objection to form.

21 THE WITNESS: No, I just said that the  
22 head of the department was in charge of putting  
23 together their team.

24 BY MS. DELGADO:

25 Q. And wouldn't they put together what



1 looks like or resembles or approximates an org  
2 chart?

3 MR. BLUMETTI: Objection to form.

4 THE WITNESS: They may.

5 BY MS. DELGADO:

6 Q. So it sounds like Mr. Miller did,  
7 correct?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: Well, I don't know what he  
10 did or didn't do. I can only agree that you  
11 read the deposition accurately.

12 BY MS. DELGADO:

13 Q. Do you have any reason to believe or any  
14 information that gives reason to believe that  
15 Mr. Miller would lie under oath about this?

16 MR. BLUMETTI: Objection to form.

17 THE WITNESS: I don't think he would lie  
18 under oath, but I don't -- I don't know what  
19 people do or don't do, and I don't know whether  
20 you were on an org chart or not, or I just can't  
21 speak to that particular issue.

22 BY MS. DELGADO:

23 Q. Did you ever see my name on any list?

24 A. I don't remember seeing your name on any  
25 lists.



1 Q. Okay. And there's another e-mail, oh,  
2 no, another exhibit here, which is an e-mail that  
3 was also produced. And so I'm going to quickly  
4 e-mail that to the court reporter so that she can  
5 please share it on her screen.

6 If you could bear with me for  
7 30 seconds. Okay. I sent that over. There you  
8 go. Wonderful.

9 (Sharing screen.)

10 BY MS. DELGADO:

11 Q. Okay. Mr. Priebus, can you see that  
12 e-mail?

13 A. Yes.

14 Q. Okay. And the date on that is  
15 December 8th, 2016, correct?

16 A. Yes.

17 Q. Okay. And in it Jason Miller appears to  
18 be recapping a meeting he had with you earlier that  
19 day. And he says, and I quote, He, that means you  
20 Mr. Priebus, "came and sat next to me on the plane  
21 and said everyone from the comms shop was going  
22 into the White House and I had final say over the  
23 org chart and he wanted to sit down to review it  
24 next week, unquote.

25 Do you remember that conversation?



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

1 A. No.

2 Q. Do you have any reason to believe  
3 Mr. Miller would have made it up?

4 A. I don't -- I don't -- I don't know if he  
5 made it up or not, but I don't know if I would have  
6 said something like that, that every single person  
7 is getting a job. But I don't remember it.  
8 Because I didn't have -- I couldn't have guaranteed  
9 everybody a job. I didn't do that anywhere.

10 Q. And he references again the same term,  
11 he says "the org chart." Does that help you  
12 refresh your recollection of discussions of org  
13 charts?

14 A. No.

15 Q. Did you see any org chart for anyone?

16 A. I saw -- I saw some org charts. I don't  
17 remember what departments they were or if it was an  
18 org chart of the overall White House structure that  
19 we used to get a basic understanding of the main  
20 department heads and jobs that were available in  
21 each of the departments.

22 I mean, there were -- I do remember some  
23 org charts or, you know, I would say during the  
24 transition there would have been org charts of  
25 different cabinets, org charts of the White House,





1 and org charts of different departments. But as  
2 far as names and details, that, I don't remember  
3 seeing.

4 Q. And in that e-mail he says that you  
5 wanted to sit down to review it next week. So does  
6 that not go to what you just said, that you weren't  
7 necessarily saying everyone had a job but that you  
8 would review it with him? Is that not consistent  
9 then with your belief of what you would have said?

10 MR. BLUMETTI: Form.

11 THE WITNESS: I don't know in particular  
12 because I don't remember the conversation, but  
13 updating, you know, the e-mail says that I was  
14 going to sit down with Jason and update him on  
15 White House structure, perhaps that happened. I  
16 don't know if it actually did or not.

17 And then as far as the e-mail from him  
18 to you, you know, the one thing I think I could  
19 have reiterated is that department heads are  
20 going to have to say over who is in their  
21 department and their own employees.

22 So I don't think that that's  
23 inconsistent. The department heads would have  
24 the -- would have the say over who was in their  
25 department.



1 MR. BLUMETTI: What's the Bates stamp  
2 number on the exhibit, Madam Reporter?

3 MS. DELGADO: I'm not showing the Bates  
4 stamp one. I don't think I am, but it is in  
5 the -- in the Bates stamp, being the production.

6 MR. BLUMETTI: Okay. If we could, I  
7 would just refer to Bates stamp exhibits if we  
8 can to keep the record clean.

9 MS. DELGADO: The PDF extraction I was  
10 going to show, the Bates stamp one made that  
11 quite difficult, but I can -- I don't think the  
12 others are part of the production, in any event.

13 THE STENOGRAPHER: And is this going to  
14 be made an Exhibit 2?

15 MS. DELGADO: Sure. Yeah.

16 THE STENOGRAPHER: How about what you  
17 read to him earlier, no, or would that also be?

18 MS. DELGADO: Yes, it would also be.

19 THE STENOGRAPHER: All right. So that  
20 one would be 1 and then this one will be 2 then.

21 (Thereupon, Plaintiff's Exhibit No. 1  
22 was marked for identification.)

23 (Thereupon, Plaintiff's Exhibit No. 2  
24 was marked for identification.)

25 MS. DELGADO: And this one will be 2,



1 yes. Thank you.

2 THE STENOGRAPHER: Do you want me to  
3 stop share?

4 MS. DELGADO: Oh, yes. Thank you.

5 THE STENOGRAPHER: All right.

6 BY MS. DELGADO:

7 Q. So who -- when you referenced final say  
8 and the e-mail references final say, so who did  
9 have final say over comms and press?

10 MR. BLUMETTI: Objection to form.

11 THE WITNESS: I mean, ultimately, it  
12 would have -- I mean, it's between Miller and  
13 Spicer, but ultimately, Sean, I would say.

14 BY MS. DELGADO:

15 Q. And for policy roles, are you able to  
16 say who had final say?

17 A. Meaning like what department are you  
18 referring to?

19 Q. Well, various departments because there  
20 are policy roles within various departments. Are  
21 you saying that each had -- each and every role,  
22 for instance, Omarosa, who was the policy head of  
23 her group?

24 A. I think that was a little -- OPL was a  
25 little bit more in flux because we had a little bit



1 of turnover and the person that was going to go in  
2 there didn't. So that's a little bit different.  
3 But if you're referring to like policy of like  
4 economics, it would have been Gary Cohn.

5 If it was DPC, Andrew Bremberg  
6 initially. You know, there's different policy -- a  
7 lot of different policy heads in different  
8 departments.

9 Q. And wouldn't you say, as you just  
10 referenced earlier, that there were some senior  
11 roles, such as Omarosa's, that didn't really fall  
12 into any particular group with a specific policy  
13 head?

14 A. Well, I don't know if she was a policy  
15 head. She was a communications person inside of  
16 OPL.

17 Q. And when you say "OPL," could you for  
18 the record state what that means?

19 A. Office of Public Liaison.

20 Q. Which brings me to my next question.  
21 What about outreach roles, who was the policy head  
22 for outreach roles, and was there more than one?

23 A. Well, there was the American Renewal,  
24 and I think Chris Liddell and -- I'm blanking on  
25 his name -- that was an outreach role. That was a



1 new office established namely by Jared Kushner.  
2 And then there was Office of Public Liaison, and  
3 there was inner government, IGA, their inner  
4 government agency outreach role. There was a --  
5 there was a lot -- quite a -- there was a few  
6 different departments doing outreach but for  
7 different things.

8 Q. And so, again, who did Omarosa report  
9 to?

10 A. She reported to ultimately George  
11 Sifakis and Steve Munisteri in OPL.

12 Q. What about Hispanic outreach roles, who  
13 did that -- who would that role report to?

14 A. That would be -- I mean, there may be a  
15 few of them that I just don't remember. You know,  
16 there might be some -- there may be one in the  
17 comms shop, one in OPL. Those would be the two off  
18 the top of my mind.

19 Q. Okay. When did you learn I was  
20 pregnant?

21 A. The day that you sent the tweets a few  
22 days before Christmas.

23 Q. Sorry. Can you repeat that?

24 A. It was the day that you had sent the  
25 tweets in the morning a few days before Christmas,



1 was the first time I got to understand that.

2 Q. That morning prior to those tweets you  
3 had had a meeting with Jason Miller, you, and Steve  
4 Bannon; do you recall that?

5 A. I recall a -- I mean, we had lots of  
6 meetings. I mean, a meeting, no. Maybe a  
7 conversation, sure. Plenty of those.

8 Q. Okay. This might help refresh your  
9 memory. It was about appointing him to White House  
10 comms director in which he has reported that you  
11 asked him if there was anything that you and Steve  
12 needed to know prior to appointing him as comms  
13 director. Does that help refresh your memory? It  
14 was a few hours before the 1 p.m. announcement went  
15 out, which announced Sean (lost sound) -- if that  
16 helps.

17 A. Okay.

18 THE STENOGRAPHER: I'm sorry. I'm  
19 sorry, if I may interrupt. You said which  
20 announced who? You kind of went...

21 MS. DELGADO: Yeah, sorry.

22 BY MS. DELGADO:

23 Q. It was a few hours before the 1 p.m.  
24 December 22nd announcement which announced Jason  
25 Miller, Sean Spicer, Hope Hicks, and I believe one



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

1 other person, and Jason was being announced as  
2 comms director. That was around 1 p.m. on  
3 December 22nd.

4 I believe there was a conversation, if  
5 that helps, Mr. Priebus, in refreshing your  
6 recollection. Obviously, you had many  
7 conversations. I'm trying to help you figure out  
8 which one this one was that I'm referring to.

9 It was the conversation you had the  
10 morning of the announcement shortly prior to the  
11 announcement with Mr. Miller about appointing him.  
12 Does that help refresh your memory?

13 **A.** I think I know what you're referring to.  
14 I didn't ask -- I don't remember exactly, but I  
15 don't -- I didn't -- what I remember is that Jason  
16 himself said -- well, I think -- I think -- let me  
17 back up.

18 I think Steve Bannon and I told Jason  
19 that the President would like him to serve as comms  
20 director, and he, aside from agreeing to that, said  
21 to me -- and I don't know if Steve was there or not  
22 listening or off to the side -- that well, it's  
23 good, but I think I do have -- you know, there was  
24 that one issue that I had, and I don't remember  
25 exactly how he put it, but he said something about



1 maybe getting some bad press because one of the  
2 issues that he had in the past, and I thought and  
3 he didn't describe it and I didn't ask, I thought  
4 that he was describing the fact that there was  
5 press reports of him going to a strip club in Las  
6 Vegas and that that was going to come back up.

7 And I told him, well, I think that's old  
8 news now and it's like well past, you know, we're  
9 like going into 2017, that was like 2016, it was a  
10 long time ago, and that was it. That was -- that  
11 was the total of that issue.

12 So when you -- when you sent the tweets  
13 out, I don't know who called me. It may have been  
14 Sean or someone forwarded it to me. I don't -- I  
15 think Sean called me and I -- or I called him or I  
16 called Don McGahn, I don't know how it got to me,  
17 but I know I asked like what is this about?

18 And that's when I got Don McGahn  
19 involved and said -- and I think I may have called  
20 Sean and said, Sean, I don't know what this is, and  
21 I think I was on the phone with Don McGahn and Sean  
22 later that morning after the tweets were sent out.  
23 And I was also in California that day, so I was  
24 three hours behind. So it was like morning,  
25 mid-morning, or something like that.





1 Q. Okay. So standing here today, your  
2 testimony is that Mr. Miller when you discussed  
3 appointing him did not tell you that I was  
4 pregnant? He did not reveal that?

5 A. He didn't. No. Because I was surprised  
6 by the situation after your tweets and found out  
7 what was going on.

8 Q. And were -- from the tweets, what did  
9 you interpret them to mean, or what were you told  
10 that they meant when you had these calls you  
11 referenced just now?

12 A. I interpreted it to mean that you were  
13 saying that you were pregnant and that Jason was  
14 the father, I think. I mean, now that I -- I mean,  
15 that's what it seemed like to me or something. I  
16 mean, it was certainly, you know, akin to something  
17 like that, and then that's when I think I called  
18 Sean and got Don McGahn on the phone.

19 Q. When you say you got Don McGahn  
20 involved, Mr. McGahn is an attorney, correct?

21 A. Yes.

22 Q. Why did you get him involved?

23 A. Because if you were pregnant by Jason  
24 Miller, I would think that that would be an issue.

25 Q. Did you call Jason?



1           **A.** I don't -- I don't think I did. It  
2           could be that Don McGahn and another lawyer did.

3           **Q.** Did you consider revoking his  
4           appointment?

5           **A.** I -- once I -- once I turned everything  
6           over to the attorneys, it was -- I think it was  
7           later determined that that would be what would  
8           happen.

9           **Q.** When you say you met with him, you and  
10          Steve, you mentioned earlier had -- you mentioned  
11          earlier you described your role as unique because  
12          you had some sort of shared power with Steve  
13          Bannon. You and Steve were meeting with Jason  
14          about his appointment because you had the power to  
15          make the appointment or not make the appointment;  
16          is that correct?

17          **A.** Well, the President decided -- the  
18          President -- look, like I said before, it was sort  
19          of a shared decision at that department head, but  
20          certainly, you know, if the President wasn't  
21          onboard, it wasn't going to happen, and he was  
22          onboard, and if -- and if that -- that's what the  
23          group decision was.

24                  But at that point I don't -- my belief  
25          is that people were not aware of your situation at



1 that point, at least -- at least from my vantage  
2 point. You know, I don't -- I can't speak to what  
3 they knew or didn't know. I can just tell you what  
4 I knew.

5 Q. Was there any discussion about at that  
6 point of the tweets what is AJ's job and is she on  
7 an org chart given that Miller has been appointed?

8 A. No, not from my -- not from my point of  
9 view.

10 Q. There was an e-mail I sent you the next  
11 day, correct? Do you recall that?

12 A. I don't recall getting it, no.

13 Q. It's been produced in this case. Do you  
14 want me to show it to you?

15 A. Yeah, sure.

16 MS. DELGADO: Mr. Blumetti, I don't have  
17 the Bates stamped one, so I can send you the  
18 Bates stamped one after, but it's in the  
19 production.

20 MR. BLUMETTI: Okay. I can read it  
21 aloud to reference it, to the extent it's the  
22 same document.

23 MS. DELGADO: I'm sorry. Go ahead.

24 MR. BLUMETTI: No, I say I'll read the  
25 Bates stamp number aloud for the record that I

1 have in my hand to the extent it's the same  
2 document I have.

3 MS. DELGADO: Thank you. I apologize,  
4 but I wasn't able to extract it from the -- the  
5 PDF of the production is rather large and it was  
6 not being cooperative when I attempted to  
7 extract small Bates stamp pages.

8 MR. BLUMETTI: Okay. Let's see which  
9 document you have, and then...

10 MS. DELGADO: Okay. It is the  
11 December 23rd, 2016 e-mail. I'm sending it to  
12 the court reporter. Sending it now.

13 (Sharing screen.)

14 BY MS. DELGADO:

15 Q. So Mr. Priebus, this is an e-mail. If  
16 you could read the date on it, please.

17 A. I see it. December 23.

18 MR. BLUMETTI: And for the record --

19 BY MS. DELGADO:

20 Q. So that's --

21 MR. BLUMETTI: I'm sorry. I'm just  
22 putting the Bates stamp number on the record.  
23 This e-mail is marked for identification as P1  
24 through P2.

25 MS. DELGADO: Thank you.

1 BY MS. DELGADO:

2 Q. So is that your e-mail address on there,  
3 Mr. Priebus?

4 A. Yes, it is.

5 Q. Okay. Do you recall now receiving this?

6 A. Not really, no. I mean, I don't recall,  
7 but, you know, it was a long time ago and maybe it  
8 could have been forwarded to the lawyers. I don't  
9 know.

10 Q. The date on it is what, sir?

11 A. December 23.

12 Q. Right.

13 So that's the day after the day we were  
14 just discussing; is that correct?

15 A. Yes.

16 Q. Okay.

17 And in it -- we don't need to read the  
18 whole thing because it's rather lengthy, but I  
19 note, if you could see in the sentence that begins  
20 "In the past few days," the next line over I say  
21 I've, quote, been removed from the org chart; is  
22 that correct?

23 A. I see that, yes.

24 Q. Okay. Did that raise any concerns in  
25 terms of ensuring or investigating what I was



1 referring to?

2           **A.** Well, I wasn't -- I wouldn't have been  
3 aware of whether you were in the org chart or out  
4 of the org chart, but I would have forwarded this  
5 e-mail most likely to the lawyers that were looking  
6 into this issue.

7           **Q.** And that would be Don McGahn?

8           **A.** Don McGahn, and he was working with  
9 another lawyer by the name of Eric Drieband. I  
10 think -- I think that was his name. But, again, I  
11 don't know whether you were in the chart or not,  
12 so...

13           **Q.** You didn't think to inquire?

14           MR. BLUMETTI: Objection to form.

15           THE WITNESS: This was -- at that point  
16 the lawyers were handling all of this.

17 BY MS. DELGADO:

18           **Q.** Did you make any suggestion?

19           MR. BLUMETTI: Objection to form.

20           THE WITNESS: I don't remember whether I  
21 made a suggestion or not. But I think I was  
22 going to listen to -- you know, allow, as I  
23 said, the department head to make the decision  
24 and obviously listen to counsel's advice and let  
25 the process move forward that way.



1 BY MS. DELGADO:

2 Q. So when you say "the department head,"  
3 am I correct you mean Sean?

4 A. Yeah, at that point Sean.

5 Q. Why wasn't Miller still the department  
6 head, in your mind?

7 A. Well, I think because he would have been  
8 subject to this review.

9 Q. What do you mean by "review"?

10 A. Well, I mean, this issue. I mean, this  
11 issue that now has come to light that the lawyers  
12 are looking at and assuming doing some level of a  
13 discussion and analysis.

14 Q. Do you know if Mr. Miller was asked to  
15 withdraw from the role or told --

16 A. I don't -- I'm sorry. I don't  
17 remember --

18 Q. Was he asked to withdraw or told to  
19 withdraw or did he voluntarily withdraw from the  
20 role?

21 A. I don't remember exactly what and how  
22 that all kind of shook out.

23 Q. You've mentioned earlier, as had Sean,  
24 about Jared Kushner's involvement in hiring. Are  
25 you aware of a book author that Mr. Miller spoke to



1 in which Mr. Miller conveyed that Mr. Kushner  
2 ultimately told him he needed to step away from the  
3 role? Does that ring a bell?

4 A. No.

5 Q. Is that something that in your  
6 experience or recollection of Mr. Kushner's role  
7 could have happened? Does that sound like a  
8 plausible recollection by Mr. Miller?

9 A. Honestly, I just don't know what and  
10 how. You know, in the end whether it was Jason,  
11 whether it was the lawyers, but certainly from my  
12 perspective this issue was in the lawyer's hands  
13 and the department head's hands.

14 Q. Hmm-hmm.

15 THE STENOGRAPHER: I'm sorry. Do you  
16 want me to take it down already, or would you  
17 still like it up?

18 MS. DELGADO: Oh, take it down. Thank  
19 you. I'm done with that exhibit. Thank you.

20 So that will be Exhibit 3.

21 THE STENOGRAPHER: 3, okay.

22 (Thereupon, Plaintiff's Exhibit No. 3  
23 was marked for identification.)

24 BY MS. DELGADO:

25 Q. And so that's December 23rd.





1 In your recollection, what happens  
2 between that e-mail and the following evening,  
3 which I'm assuming, but stop if I'm wrong, you  
4 probably recall when Mr. Miller stepped away?

5 A. I remember when he stepped away. I  
6 don't remember whether it was the following evening  
7 or two evenings or the same day, but I remember he  
8 stepped away.

9 Q. Right. It might be two evenings.  
10 You're right. I'll retract that. I'm not sure  
11 when it was.

12 But do you remember anything from that  
13 e-mail to the point Mr. Miller stepped away? Did  
14 you have any involvement at all, or did you, as we  
15 say, completely leave it up to the lawyers?

16 A. Well, I mean, I communicated with the  
17 lawyers, yes.

18 Q. Right.

19 And I don't want to hear about what your  
20 communications with the lawyers were to the extent  
21 that there was any privileged communication there.

22 Were they representing you in any sense?

23 A. They were representing the White House  
24 and I believe the transition.

25 Q. So they were not representing you?



1           **A.** Well, I mean, to the extent that I was  
2 involved in the transition, sure.

3           **Q.** Did at any point they say we're  
4 representing you, Reince Priebus, here's an  
5 engagement letter?

6           **A.** No.

7           **Q.** So what were your discussions with  
8 Mr. Drieband and/or with Mr. McGahn?

9           MR. BLUMETTI: I would object to the  
10 extent that it's protected by attorney-client  
11 privilege. Just because the witness wasn't  
12 retained as a client doesn't mean it wasn't a  
13 privileged communication with an employee of the  
14 transition team at the White House.

15           MS. DELGADO: We can take that up.

16           Okay. We can certify that.

17           BY MS. DELGADO:

18           **Q.** You know -- well, we'll keep going a  
19 couple of more minutes. I know I'm at my 11:30  
20 stop time.

21                   Are you aware that Mr. Drieband  
22 communicated an offer of employment with the  
23 campaign to me?

24           **A.** No.

25           **Q.** So you were never asked again -- apart



1 from those December 22nd tweets and forwarding that  
2 December 23rd e-mail, you never asked or were  
3 updated or informed as to what went on?

4 **A.** Yes. I mean, I communicated with the  
5 lawyers about what was going on, and they made an  
6 analysis of it, and after that Jason, one way or  
7 the other, wasn't in the role.

8 **Q.** And did you inquire, aside from Jason  
9 not being in the role, well, what is happening with  
10 AJ?

11 **A.** As I said before, I never -- I don't  
12 know nor did I perceive you to be in the matrix of  
13 hires in the first place, so I don't know whether  
14 you were or whether you weren't. So there was --  
15 there wasn't -- it just wasn't -- didn't -- it  
16 didn't come up to me.

17 **Q.** Let me probe you on that a little, if I  
18 may. When you say you didn't perceive me of being  
19 in the matrix of hires, so is it your --

20 **A.** Perceive meaning I don't have knowledge  
21 of you being in that -- in that matrix.

22 **Q.** But you felt that my tweets about the  
23 pregnancy were serious enough and my not having a  
24 job and the discrimination were serious enough to  
25 get an attorney involved?



MR. BLUMETTI: Objection to form.

THE WITNESS: Well, I mean, I think that if a campaign -- someone on the -- two people on the campaign staff, if there's an allegation that was going on in the campaign and you're hiring someone to be the head of communications, I think it would be a natural thing to bring in the head of the communications department, Sean Spicer, and the counsel to say this needs to be looked at. That's a pretty normal thing to do, I would believe.

BY MS. DELGADO:

**Q.** From a legal angle, or from a PR angle?

**A.** Well, both I mean, but I mean, I think that -- I mean, it would be both. I mean, in my mind, it was both, probably more of a legal and a like, hey, what's going on here? You know, what does this mean, and someone needs to look at this. That's my viewpoint. I mean, an investigation should be had. It's pretty normal.

**Q.** And going back to -- and I know you've clarified you only meant in a literal sense that you were not aware of my being in a literal matrix or list that you had personally seen. In a nonliteral form, would it be your understanding



1 that someone who was on the transition team, who  
2 was a senior advisor with a Harvard law degree, who  
3 spoke Spanish, had done Hispanic outreach, was well  
4 liked by Mr. Trump, well liked by the Trump family,  
5 would it be your impression, understanding,  
6 viewpoint, that that person probably is in the  
7 pipeline for a White House job?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: I wouldn't know. I mean,  
10 there are always factors and opinions and, you  
11 know, I -- I don't know if I've ever met you.  
12 So I mean, I -- if this is whether you were in  
13 the org chart or not, I just didn't know, and it  
14 never came up to me.

15 BY MS. DELGADO:

16 Q. Did anyone who was in the transition  
17 team not go into the White House?

18 A. I wouldn't know. I mean, I didn't do a  
19 head count of the transition team and a calculation  
20 of who was there and who didn't. I wouldn't -- I  
21 don't know.

22 Q. Is it typical for individuals in a  
23 transition team to go into the White House?  
24 Because the transition team is rather small, is it  
25 not?



1 MR. BLUMETTI: Form.

2 THE WITNESS: I don't know. I've only  
3 been in one transition team, so I wouldn't know  
4 what's typical or not. It certainly wasn't that  
5 typical. I think it was a pretty unique  
6 transition.

7 BY MS. DELGADO:

8 Q. Was there a Sanders on the transition  
9 team; do you know, Sarah Huckabee Sanders?

10 A. I think she was. She certainly -- I  
11 don't know. I don't know if she was or not. I  
12 know Sean was.

13 Q. And Drieband was an employment law  
14 attorney, right?

15 A. I believe so.

16 MS. DELGADO: Okay. Then now is a good  
17 time for a break.

18 THE WITNESS: Thank you.

19 MS. DELGADO: No. Thank you. Okay. So  
20 five minutes, unless anyone needs longer?

21 THE WITNESS: Well, I mean, why don't we  
22 just go ten just to -- you know, 11:45, use the  
23 restroom, check e-mails and come back, if that's  
24 okay?

25 MS. DELGADO: Sounds good. I have



1 11:36. My time might be -- yes.

2 THE WITNESS: 11:45? I'm just going to  
3 put it on --

4 MS. DELGADO: Perfect. Come back at  
5 11:45. Thank you.

6 (At this time a recess was taken.)

7 BY MS. DELGADO:

8 Q. Mr. Priebus, did Donald Trump give any  
9 opinion on any of what we were just discussing,  
10 whether it be my employment, the pregnancy, any  
11 related issue or thereof?

12 MR. BLUMETTI: Objection to form.

13 BY MS. DELGADO:

14 Q. And I can rephrase it. I can rephrase  
15 it.

16 Let's go one by one. Did Donald Trump  
17 give any opinion on my employment, that you recall?

18 A. When?

19 Q. At any point.

20 Have you ever heard or seen any  
21 communication or been provided any message from  
22 Mr. Trump or had any communication of any kind with  
23 Mr. Trump about me, including but not limited to,  
24 about employment?

25 MR. BLUMETTI: Objection to form.



1 THE WITNESS: Not about employment.

2 BY MS. DELGADO:

3 Q. Okay. What was it about?

4 A. I think when the lawsuit was filed, I  
5 think he thought it was frivolous or inappropriate  
6 or wrong and sort of out of bounds. But that --

7 Q. When you say "when the lawsuit" -- go  
8 ahead. Sorry.

9 A. I was saying that's the only -- when you  
10 ask a question like that, it's the only thing that  
11 I can remember.

12 Q. And when you say "when the lawsuit," do  
13 you mean this lawsuit?

14 A. Yeah. But never commented on you as far  
15 as being an employee of the White House and never  
16 came up --

17 Q. So --

18 A. -- that I --

19 Q. Uh-hmm. Go ahead.

20 A. -- that I remember.

21 Q. So you're referencing this lawsuit which  
22 was filed in December 2019?

23 A. No. I'm referring to I think there's a  
24 previous iteration of it that came in 2017 at some  
25 point.



1 Q. Trying to help you figure out what  
2 you're referring to here because there wasn't a  
3 lawsuit filed in 2017, so...

4 A. I don't know if it was a draft complaint  
5 or something that you had sent in 2017. There was  
6 something that happened in 2017 that brought some  
7 of these allegations to light.

8 Q. Okay. I understand you now. Thank you  
9 for clarifying.

10 And where did this conversation take  
11 place?

12 A. Either in the White House or over the  
13 telephone with him.

14 Q. And who else was on the call?

15 A. I don't -- I don't think anyone. Maybe  
16 Don McGahn.

17 Q. And do you recall why it was mentioned?

18 A. I think there was a document that I got  
19 when I was in the White House that either was a  
20 draft complaint or something from you with these  
21 allegations in it. I'm just giving you my best  
22 memory.

23 Q. Right.

24 And why was that raised with Donald  
25 Trump?



1           **A.** Because I think he was mentioned in the  
2           allegations or the campaign, the transition, a  
3           bunch of people. I think -- I think my best  
4           recollection is that there was something with these  
5           allegations that were sent, and I --

6           **Q.** And your -- hmm-hmm.

7           **A.** -- and I think I and Don McGahn are  
8           some -- somehow I recall informing the President of  
9           this, and that was like one time that I remember it  
10          coming up because you asked me an all-encompassing  
11          question, and that's my only recollection of his  
12          view of it.

13          **Q.** And to make sure I heard you correctly,  
14          you said your recollection was that he thought it  
15          was, quote, frivolous or inappropriate?

16          **A.** Yeah, like it's not -- it can't -- it's  
17          not -- yeah, something like that.

18          **Q.** And he thought the whole thing was or  
19          parts of it?

20          **A.** I don't -- it was just -- it wasn't --  
21          we didn't dissect it. I didn't get into -- I don't  
22          remember any detail. I just remember -- I'm trying  
23          to answer your question in the best way I can  
24          without not disclosing everything I can remember  
25          that might pertain to your question.



1 Q. Understood.

2 So that was the only time you recall  
3 ever having a conversation or written communication  
4 or any type of communication involving or with  
5 Mr. Trump where I came up or was discussed?

6 A. That's my recollection.

7 Q. Even though Mr. Spicer referred to the  
8 tweets as a 5-alarm fire and his phone was going  
9 off all weekend and it was on the cover of Drudge,  
10 it wasn't something Mr. Trump spoke of, that you  
11 know of?

12 MR. BLUMETTI: Objection to form, asked  
13 and answered.

14 THE WITNESS: I don't -- I'm not  
15 suggesting to you that when that issue came up  
16 at the end of December that it wasn't  
17 communicating that the President like look,  
18 there's an issue that the lawyers are looking  
19 at, here's what we know and here's what the  
20 conclusion is, I'm not saying that didn't  
21 happen.

22 I just don't remember specifically what  
23 was said or what he said or -- you know,  
24 obviously, it was an issue, but I don't remember  
25 the details for you as I sit here today.



1 BY MS. DELGADO:

2 Q. Would it have been brought to his  
3 attention?

4 A. What?

5 Q. The tweets, the complaint, the  
6 December 22nd to 24th period?

7 MR. BLUMETTI: Objection to form.

8 THE WITNESS: I'm sure -- I would be --  
9 I would be surprised that it wasn't brought to  
10 his attention, certainly the allegation in  
11 regard to Jason Miller and you and your tweets,  
12 but I don't remember specifically what was  
13 discussed. I remember the lawyers handling the  
14 matter. That's what I remember.

15 BY MS. DELGADO:

16 Q. And to be clear, your understanding is  
17 those lawyers represented the White House and the  
18 transition team?

19 A. Excuse me? Yes. I -- right. I think  
20 so.

21 Q. And did you have any communications with  
22 Mr. Miller during -- post those tweets, the first  
23 set of tweets, or any time after through early  
24 2017?

25 A. You mean during the conversations I had



1 with the lawyers?

2 Q. And I don't want to misstate my  
3 question. It's not during the conversations with  
4 the lawyers. It's any time after my first tweet,  
5 December 22nd through early 2017, when did you  
6 speak to Mr. Miller?

7 A. If I did, it would have been with  
8 lawyers.

9 Q. And you don't remember if you did?

10 A. I have a recollection of speaking with  
11 lawyers, with Jason on the phone, but that's the  
12 only recollection I have of communicating with  
13 Jason about this issue, was the morning after your  
14 tweets.

15 Q. And do you recall what was said?

16 MR. BLUMETTI: Objection, form. Object  
17 to the extent it calls for the disclosure of  
18 attorney-client privilege.

19 MS. DELGADO: It's a conversation with  
20 Mr. Miller, it's not attorney-client privilege.  
21 Even if it were by an attorney representing  
22 Mr. Priebus, it's a conversation with  
23 Mr. Miller.

24 THE WITNESS: I believe that at the  
25 conclusion of the call, that the -- that he



1 pretty much confirmed that these -- you know,  
2 that the affair and the fact that you were  
3 pregnant was true, and then that was the basic  
4 gist of the conversation.

5 He had wondered whether it was true or  
6 not out loud. I didn't believe him, and I don't  
7 think the lawyers believed him either.

8 BY MS. DELGADO:

9 Q. And what was the conclusion of that  
10 call?

11 A. The conclusion was thank you very much  
12 and the lawyers took over.

13 Q. So it was more just the kind of call to  
14 get facts from him?

15 A. Right.

16 Q. No directive was given to him as far as  
17 you're no longer going to be in the White House or  
18 you will be?

19 A. Well, I mean, not at that initial point.  
20 That was just the one time I remember, and it's a  
21 vague memory, but it's the one time I remember  
22 discussing it where he was part of a conversation.

23 Q. And you say he stated that he wondered  
24 aloud whether I was actually pregnant or not and  
25 you did -- you did believe that I was?



1 A. I didn't believe Jason.

2 Q. Okay. Okay.

3 Would it be realistic for Jason Miller  
4 to be comms director and for a woman he impregnated  
5 to also be in the West Wing?

6 MR. BLUMETTI: Objection to form.

7 THE WITNESS: Yeah, what do you -- say  
8 that again.

9 BY MS. DELGADO:

10 Q. Would it be realistic for Jason Miller  
11 to be comms director and for a woman he impregnated  
12 to both serve in the White House in the West Wing  
13 simultaneously?

14 MR. BLUMETTI: Objection to form and the  
15 use of the word "realistic."

16 BY MS. DELGADO:

17 Q. In your opinion.

18 A. I don't know. There seemed to be -- it  
19 doesn't seem to be -- it doesn't seem to be  
20 appropriate to me, but, I mean, I guess -- you  
21 know, I guess depending on the circumstances, but  
22 it seems inappropriate from beginning to end. It  
23 seems inappropriate to have a relationship with a  
24 subordinate. It seems inappropriate from the very  
25 start. So to me the whole thing is bad from



1 beginning to end.

2 Q. Was my pregnancy embarrassing to the  
3 campaign?

4 MR. BLUMETTI: Object to form.

5 THE WITNESS: I don't -- I don't know  
6 what the campaign thinks or who you're referring  
7 to as the campaign, but it certainly -- the  
8 circumstances are, in my opinion, inappropriate.  
9 I think to most people it would be  
10 inappropriate.

11 BY MS. DELGADO:

12 Q. Was my pregnancy embarrassing to the  
13 incoming Trump administration?

14 MR. BLUMETTI: Objection to form.

15 BY MS. DELGADO:

16 Q. In your opinion.

17 A. I don't know what the incoming -- I  
18 mean, certainly he wasn't hired, so, I mean, the  
19 conclusions were that he wasn't going to come in  
20 and take this job because of the inappropriateness  
21 of the situation that he participated in.

22 Q. Did you ever see any document or did you  
23 ever have any conversation or were you ever part of  
24 any conversation, even in a passive way, where my  
25 employment or nonemployment was discussed?





1 MR. BLUMETTI: Objection to form, asked  
2 and answered.

3 THE WITNESS: Can you -- can you repeat  
4 that just so that when I --

5 BY MS. DELGADO:

6 Q. I didn't ask --

7 A. I don't ever -- I don't ever remember  
8 having any conversation with any person about your  
9 employment or nonemployment in the White House.  
10 And I don't -- I don't -- or I don't think any  
11 conversation even before that period of time, so  
12 no.

13 Q. Did you hear of any such conversations  
14 or any documents existing that referenced  
15 potential, actual, revoked employment of mine?

16 A. Did you say "revoked"?

17 Q. Revoked.

18 Potential employment or actual  
19 employment or revoked employment; anything dealing  
20 with employment of my -- soft employment; anything  
21 of mine, even if you were not a party to the  
22 conversation, did you hear of any such conversation  
23 or hear of the existence of any such document?

24 MR. BLUMETTI: Objection to form.

25 BY MS. DELGADO:



1 Q. And I can break it up, if you'd like.

2 A. Yeah, I don't --

3 Q. I just wanted to speed things up.

4 A. No, I think the answer is no. I don't  
5 remember you being discussed for employment or  
6 nonemployment. You know, Sean would be dealing  
7 with that, but I don't remember you specifically  
8 ever being discussed to be employed or being in the  
9 org chart, as you brought up, or listed or not  
10 listed. I just don't -- I don't believe that that  
11 happened.

12 Q. But wouldn't it have come up,  
13 Mr. Priebus, when the tweets happened? Wouldn't  
14 someone, even if it's not you, have said, oh, and  
15 by the way, is there a job for her? What is she  
16 complaining about? It seems that would -- that red  
17 flag would arise, at least once the situation with  
18 Jason, especially if you have lawyers involved,  
19 came to light?

20 Still you're saying there was no  
21 discussion of let's make sure her job isn't  
22 compromised or let's kick her out or any -- no  
23 discussion of a job or lack thereof even after this  
24 became a 5-alarm fire, as Sean Spicer said?

25 MR. BLUMETTI: Objection to form.

1 THE WITNESS: I don't -- I don't  
2 believe -- my belief is that you were never in  
3 the matrix to get -- you were not in -- as I sit  
4 here today, you were not in the matrix to get a  
5 job. I don't -- it never came up to me because  
6 I don't think it was in Sean's opinion, but that  
7 wasn't something I would have known at that  
8 time.

9 The only thing I vaguely remember is  
10 that someone told me that Hope Hicks had said  
11 that, you know, she wouldn't come in the White  
12 House if you were coming in the White House. I  
13 don't know if I heard that after all this or  
14 before or when. That's the only time I ever  
15 remember it, and I -- I just -- it just never  
16 came up.

17 I do believe that the lawyers looked at  
18 the situation that certainly involved you, so of  
19 course you would have come up in those  
20 conversations with the lawyers. And then the  
21 decision was that Miller didn't come into the  
22 White House to the extent that the tweets and  
23 the situation affected you, I wouldn't be  
24 privy -- I don't know that.

25 BY MS. DELGADO:



1 Q. But you said earlier when you say now  
2 that I was never in the matrix, you said earlier  
3 you didn't know who was in what charts.

4 A. I'm saying it never came to me that you  
5 were in the matrix before --

6 Q. Oh.

7 A. -- January 20th.

8 Q. So not that I was never in it, just that  
9 you weren't aware if I was?

10 A. Yeah. I wasn't aware if you were or  
11 weren't.

12 Q. Okay.

13 A. Like I said, I let -- I let Sean put,  
14 you know, his staff together, that he wanted to put  
15 together.

16 Q. Were you ever told that for some reason  
17 I was only interested in Sean's group or working in  
18 press or comms?

19 A. No one ever -- you were just never  
20 brought up to me, sorry to say, but...

21 Q. No. Fair enough.

22 I just -- you repeatedly have referenced  
23 that group, so I was just wondering if you were  
24 under some impression that I had specifically  
25 sought an interest in or sought employment in that



1 particular group of Sean's. And you're saying  
2 you --

3 A. I don't know what -- and I don't know  
4 what groups you were trying to get employed by, but  
5 to the extent that it was within the communications  
6 job, that's why I keep referencing Sean as being in  
7 charge of that.

8 Q. Sure.

9 And did Hope Hicks have decision-making  
10 authority? What group did she lead?

11 A. She was in the -- in the oval with the  
12 President.

13 Q. Who did she report to?

14 A. The President and Sean, probably; a  
15 little bit of both.

16 Q. All right. I will have a video to show  
17 you here a little later.

18 Were you aware of Hope Hicks'  
19 extramarital affair with Corey Lewandowski?

20 A. No. I mean, other than what was in a  
21 page 6 article.

22 Q. What page 6 article?

23 A. I don't know. I remember who -- I  
24 remember there was an article of them shouting at  
25 each other and that's what I remember. But I'm not



1 aware of any affair.

2 Q. So sitting here today, your testimony  
3 under oath is that the only thing you have ever  
4 heard about Hope Hicks and Corey Lewandowski having  
5 an affair is strictly a page 6 article where -- and  
6 I know the article you're referring to, where Hope  
7 Hicks was having a crying and screaming match with  
8 Mr. Lewandowski outside of Trump Tower, that's the  
9 only time you've heard of reference to Corey and  
10 Hope?

11 MR. BLUMETTI: Objection to form.

12 THE WITNESS: I may have heard rumors,  
13 but from where and when, I don't know, but  
14 that's about it.

15 BY MS. DELGADO:

16 Q. Do you concede that there may have been  
17 issues related to Ms. Hicks and Mr. Lewandowski  
18 that would have prompted her to have made the  
19 comment that you referenced she may have made  
20 earlier?

21 MR. BLUMETTI: Objection.

22 THE WITNESS: I don't know. I just  
23 never got into it.

24 BY MS. DELGADO:

25 Q. Well, when was the last time you spoke

1 with Jason Miller?

2 A. I saw him by coincidence at the Palm  
3 Beach Airport about two weeks ago.

4 Q. And what was that conversation like?

5 A. Hmm, about five minutes about the  
6 campaign, being on the road. He was going back to  
7 D.C. Maybe a little bit about the primary.

8 Q. Anything about this lawsuit?

9 A. No.

10 And then we got on the plane and we were  
11 sitting apart and that was it.

12 Q. Are you familiar with reports of -- and  
13 maybe not just reports, but are you familiar with  
14 statements Mr. Trump has made or reports about  
15 Mr. Trump in which it has been mentioned how much  
16 Mr. Trump values those who do a good job defending  
17 him or advocating for him on television?

18 MR. BLUMETTI: Objection to form.

19 THE WITNESS: He definitely likes people  
20 who do a good job of defending him on  
21 television, I'll give you that.

22 BY MS. DELGADO:

23 Q. So would you say that, and particular in  
24 the Trump administration, being somebody who  
25 advocated for Mr. Trump on TV was definitely a plus



1 as a qualifier for a job?

2 A. I don't know about a qualifier, but he  
3 liked it.

4 Q. Fair enough.

5 Do you recall the statement that was put  
6 out when Fidel Castro died on behalf of Mr. Trump?

7 A. No.

8 Q. Do you remember from the campaign who  
9 were the individuals, the senior advisors besides  
10 myself, who would go on television -- whose role  
11 was to go on television to defend Mr. Trump? Do  
12 you remember some of those names?

13 A. I don't know if it was their role to go  
14 on TV, but there were people that were on TV that  
15 were very defensive of President Trump.

16 Q. And did any of those seek but not go  
17 into the White House? Or let me make it clearer.  
18 Which ones of those didn't go into the White House?

19 MR. BLUMETTI: Objection to form.

20 THE WITNESS: I don't know, because I  
21 don't know all the people you're talking about.  
22 I mean...

23 BY MS. DELGADO:

24 Q. Okay. Let me name a --

25 A. I honestly don't know all the people





1 that ever defended the President on TV. I mean,  
2 that's a big -- it's -- I defended the President,  
3 other people. I wasn't -- are you suggesting that  
4 there were paid people on TV?

5 Q. No.

6 My question was from the campaign, and  
7 I'll just make it simpler for you then. I'll just  
8 give you the names. Boris Epshteyn, did he go into  
9 the White House?

10 A. For about two months.

11 Q. Why just two months?

12 A. I'm not a hundred percent sure if I'd be  
13 able to say.

14 Q. What do you mean?

15 A. I'm not sure. I mean, I would have to  
16 talk to my attorney to find out whether I can say.

17 MR. BLUMETTI: Is it subject to a  
18 confidentiality order?

19 THE WITNESS: It -- I would have to talk  
20 to you privately. I just have to make sure.

21 MR. BLUMETTI: Okay. We can go off the  
22 record if you don't have a question pending.

23 MS. DELGADO: I'd rather not  
24 mid-deposition.

25 BY MS. DELGADO:



1 Q. Who is the attorney? When you say "my  
2 attorney," are you referencing --

3 A. I'm talking about Jared. I'm talking  
4 about Jared. I was going to ask Jared a question  
5 before I answer. I'm not worrying about answering  
6 the question. It's not -- I just have to make sure  
7 I'm not violating anything before answering a  
8 question like that.

9 Q. Was there a confidentiality agreement  
10 you signed?

11 A. I'm not sure.

12 Q. You're not sure you signed an agreement?

13 A. Trust me, if you knew what I was  
14 thinking about, you'd understand, but I can't -- I  
15 have to -- I think I have got to ask Jared first.

16 Q. Okay. We can circle back to that at the  
17 end.

18 A. Okay.

19 Q. Nevertheless, Boris did go into the  
20 White House, correct?

21 A. Yes.

22 Q. Okay. And Omarosa went into the White  
23 House, correct?

24 A. Yes.

25 Q. And Sarah Sanders went into the White



1 House, correct?

2 A. Yes.

3 Q. Okay. And even though Boris was only  
4 there two months, am I correct in my recollection  
5 that he then obtained almost immediately thereafter  
6 a job with Sinclair Broadcasting Group? Does that  
7 ring a bell?

8 A. It rings a bell.

9 Q. So would you say even two months in the  
10 White House can be a nice jumping point for a great  
11 job, is that a fair --

12 A. For some people, but for others not. It  
13 depends.

14 Q. Like what's an example, someone for whom  
15 it hasn't been a good jumping point?

16 A. I think that there are plenty of people  
17 that didn't get the benefit of serving in the White  
18 House as opposed to others.

19 Q. Can you give some examples?

20 A. I'd rather not.

21 Q. Why is that?

22 A. Well, I mean, some of these folks aren't  
23 doing very well. I don't think Mark Meadows is  
24 very happy. I don't think John Kelly is ecstatic.  
25 I don't think Rex Tillerson is, you know, thrilled.



1 I mean, I think there's a lot of folks that, you  
2 know, the corporate world I don't believe has been  
3 particularly kind to Trump alumni. I don't think  
4 that the media world has been particularly kind to  
5 Trump alumni.

6 I think there are some exceptions, but  
7 it -- I don't think it would -- I certainly don't  
8 think that the -- you know, the Obama alumni and  
9 the Bush alumni I believe were treated far better  
10 than the Trump alumni have been.

11 Q. Fair enough. And I think there are  
12 different groups. As you say, it depends; like a  
13 John Kelly type or a Boris. I suppose it depends  
14 on your area of focus and your background. I  
15 understand that.

16 But let's take the three counterparts of  
17 mine on the campaign. Boris, you agreed, then went  
18 to Sinclair Broadcast Group. Oh, do you recall --  
19 \$500,000 a year, do you recall reading that  
20 salary --

21 A. No.

22 Q. -- somewhere? Okay.

23 And Omarosa went on to write a best  
24 seller; is that correct? Does that ring a bell?

25 A. Yeah. Like a tell-all book where she's



1 recording people in the White House. I mean, yeah,  
2 I guess if that's what you consider to be success,  
3 sure.

4 Q. Speaking financially, would that be a  
5 success financially?

6 A. Writing a tell-all book and disclosing  
7 conversations, I guess if that's -- if you consider  
8 that success financially, fine. I don't know if  
9 it's ultimately successful because I think when you  
10 do that, you end up potentially hurting yourself in  
11 the end.

12 Q. And Sarah, once she left and used her  
13 time in the White House, too, it seems furthered  
14 her political career and is now governor; is that  
15 accurate?

16 A. Yes.

17 Q. Okay. And do you -- I think I -- I may  
18 have already asked this, so if I did, please  
19 correct me, but do you recall which senior advisors  
20 from the campaign didn't get a job?

21 A. I don't recall. I mean, I'd have to do  
22 research and figure it out.

23 Q. Do you recall anyone saying, Reince, I  
24 worked on the campaign, I would like a job at a  
25 senior level or a mid-level on the campaign, and



1 not receiving a job?

2 A. I'd have to think about it a little bit  
3 further. I'm sure there are plenty.

4 Q. But none comes to mind?

5 A. Yeah. I mean, there are RNC people that  
6 wanted jobs and didn't get jobs.

7 Q. But I mean the campaign.

8 A. I don't think I was their go-to person  
9 to talk about White House jobs from the campaign.  
10 There were others like Steve and Kellyanne and Dave  
11 Bossie and Jared that I think were plugging people  
12 in that they felt -- were advocating for people  
13 that they felt should come on board. And I think  
14 they covered a lot of those people.

15 And I was probably the -- me and Katie  
16 Walsh were the point people for folks that applied  
17 from the RNC that were getting pinged on. I don't  
18 think that the campaign people naturally came to  
19 me.

20 Q. Did Mr. Miller in any of the  
21 conversations that were had ever ask, demand, or  
22 request that I not be in the White House?

23 A. You never came up from -- from him to me  
24 about getting a job in the White House.

25 Q. I mean more when he was asked to leave,



1 if he was asked to leave, at that point did he make  
2 any request?

3 A. Not to me.

4 Q. Okay. Would you concede, and please  
5 don't take offense to this, but would you concede  
6 that there was some pushback, and it may have been  
7 harder for folks from the RNC to get a job versus  
8 from the campaign because of the fact that the RNC  
9 was -- I should say not the fact -- but the RNC  
10 folks were perceived as being not the most  
11 supportive of Trump, and I don't mean you, sir, but  
12 the RNC ranks overall not as supportive of Trump  
13 during the primaries and even through the general  
14 elections, especially through the *Access Hollywood*  
15 tape revelation? Would you say that's fair?

16 MR. BLUMETTI: Objection to form.

17 THE WITNESS: What's fair?

18 BY MS. DELGADO:

19 Q. To say that it would be harder to get a  
20 job coming from the RNC than from the campaign  
21 because Mr. Trump was aware that the RNC had been  
22 quite resistant to him. Not you personally,  
23 although you did criticize him publicly a few  
24 occasions, but the campaign was seen -- the  
25 campaign folks were seen by Mr. Trump and by the



1 press as much more pro-Trump than the RNC was. And  
2 again, I don't mean you.

3 A. I certainly saw the press that made  
4 those conclusions, but I don't -- the President  
5 never told me that, that that was his perception.

6 Listen, I'm aware of the press. I'm  
7 aware of what people in the press said. But as to  
8 whether -- you're asking me whether it was  
9 communicated to me, and I mean, eventually it was  
10 clear that there was a division that was building  
11 between the RNC and the campaign, from the press,  
12 but it -- we were doing our best to meld the two  
13 together. And I think that's partly why I was  
14 named as a co-equal by the President with Steve  
15 Bannon. But I don't know for sure, because at the  
16 time we were just trying to keep everyone together.

17 Q. Once he won the nomination; is that  
18 correct?

19 A. I kind of lost track of your question.  
20 Once he won the nomination?

21 Q. Would you say the RNC employees were as  
22 pro-Trump as the campaign employees?

23 A. Depends which employees you're talking  
24 about.

25 Q. Overall, if you had to take the mean or





1 the average, would you say it's fair to say that  
2 the campaign employees, given they had opted to  
3 work for Donald Trump, especially those who were  
4 working with the campaign prior to Trump securing  
5 the nomination, would you say those were generally  
6 more pro-Trump than the RNC employees?

7 MR. BLUMETTI: Objection to form.

8 THE WITNESS: I just think it depends on  
9 what the employee -- who the employees are you  
10 are talking about.

11 BY MS. DELGADO:

12 Q. Was there any employee at the RNC that  
13 you recall that was particularly in favor of  
14 Mr. Trump?

15 A. When he was the nominee?

16 Q. No, prior to his being a nominee.

17 A. It's a different role. I mean, you know  
18 that --

19 Q. Right.

20 A. -- the role of the RNC is to support  
21 whoever the nominee is.

22 Q. Correct. Correct. Understood. I'm not  
23 faulting.

24 But nonetheless, whether it's a facet of  
25 the role in which they are boxed in by or not, the



1 outwardly pro-Trump individuals are much more  
2 likely to be found in the campaign than in the RNC;  
3 is that correct?

4 **A.** I don't know if that's true or not. I  
5 know that's what you perceive to be true, but I  
6 think there are good apples and bad apples that  
7 come from both scenarios that you are trying to  
8 outline, so --

9 **Q.** Okay. I'll give you an example.

10 **A.** -- I would not accept that every person  
11 that worked in the Trump campaign were, you know,  
12 super pro-Trump and always loyal and always good  
13 actors, and I wouldn't say the same about the RNC.  
14 I think that there are people -- you know, you have  
15 to judge everything on an individual basis.

16 **Q.** Let me give you -- and I didn't say all  
17 from the campaign were. I was saying overall. But  
18 I'll give you an example.

19 Did you hire -- because you were  
20 reported as specifically hiring him -- a Mr. Raj  
21 Shah?

22 **A.** At the RNC he was our research director.

23 **Q.** Who hired him to be deputy White House  
24 press secretary?

25 **A.** Sean.



1 Q. Sean did?

2 A. I mean, I'm certain he -- I don't know.  
3 You'd have to ask him. Because how, you know, that  
4 processed and maybe other people met with him,  
5 maybe he brought him in to see the President, I  
6 don't know what process he went through for that.

7 Q. And he called Trump "a deplorable"  
8 during the election, didn't he?

9 A. I don't remember that.

10 Q. And he called the release of the *Access*  
11 *Hollywood* tape, well, "some justice." You don't  
12 remember that?

13 A. No.

14 Q. Okay. And didn't he also help get  
15 embarrassing footage of Mr. Trump when he was  
16 working for and advocating for Jeb Bush?

17 A. I don't know. I mean...

18 Q. Fair enough. If you don't know, just  
19 asking. And we'll see.

20 And so I think we segued off track. I  
21 think I was asking you a question about whether  
22 Mr. Miller at the point that it was either he opted  
23 to leave or he was told to leave, did not make any  
24 requests as to any job or potential job regarding  
25 me?



1           **A.** I don't remember him saying anything  
2           like that, but I think at that point he was talking  
3           to the lawyers.

4           **Q.** Okay. Fair enough.

5                     Do you have any idea, if I didn't have a  
6           White House job, which I'm already conceding you  
7           don't know if I did or didn't; I'm not asking you  
8           to repeat all that that's been discussed already.  
9           But if I didn't or if it had been decided that I  
10          did, but I no longer did, do you have any idea or  
11          information or reason to believe or explain why Mr.  
12          Spicer wouldn't simply come on and tell me, AJ, you  
13          don't have a job?

14          **A.** I don't know why he -- I don't know the  
15          answer to that question.

16          **Q.** Okay. Asking if you did. If you  
17          don't --

18          **A.** Yeah.

19          **Q.** -- that's okay.

20                     And Sean during his deposition spoke of  
21          particular individuals and said they were, quote,  
22          in the pipeline for employment. What does "the  
23          pipeline" mean, if you know?

24          **A.** I don't know what he meant by that.

25          **Q.** Okay.



1           **A.** Maybe it was just a list of a bunch of  
2           potential hires.

3           **Q.** There was an article about Mr. Paul  
4           Manafort having a friend who wanted a job, a high  
5           ranking friend in the banking industry who sent his  
6           resumé to Jared Kushner. Is that because, as you  
7           mentioned earlier, Mr. Kushner had power in hiring  
8           and hiring decisions?

9           MR. BLUMETTI: Objection to form.

10          THE WITNESS: I don't know why he sent  
11          it to Jared, but I would say that in most cases  
12          people who wanted jobs sent information and  
13          resumes to whoever they had a connection to, to  
14          try and get a job, or say, look at this person,  
15          look at that person, here's a couple resumes,  
16          here's some smart people. So I think most --  
17          you know, I wouldn't be surprised. You know, a  
18          lot of folks got e-mails like that.

19          BY MS. DELGADO:

20          **Q.** And the ultimate decision maker, would  
21          you say it was Trump, or did Trump in some  
22          instances just go with what was brought to him?

23          MR. BLUMETTI: Objection, form.

24          THE WITNESS: I would think that, like I  
25          said before, the department heads had reign over



1        their own departments, and in most cases the  
2        President would be involved on major department  
3        hires, at least discussed and get sign-off.

4                And then from there, you know, there  
5        were only occasional -- you know, a lot of the  
6        things we were doing in the beginning were  
7        the -- just the very big department head  
8        cabinet, major ambassadors, and then from there  
9        presidential personnel took over after  
10       January 20th.

11       BY MS. DELGADO:

12               Q. Okay.

13               A. And like I said, I mean, in many of  
14       these cases, the transition team as a whole, headed  
15       up by the vice president, they were the ultimate  
16       organizers of the process.

17               Q. Uh-hmm. Do you recall the name --  
18       actually, let's back up a bit. Could you tell me a  
19       bit how the security clearance process worked?

20               A. At the White House?

21               Q. Yes.

22               A. Well, Joe Hagin and Don McGahn and their  
23       offices headed up most of that process. It is a --  
24       you know, there's a lot of detail to it, but  
25       everyone had to fill out a SF 86 form, which is a



1 detailed background check on each individual.

2 And then after that was done, the DOJ  
3 and I believe the FBI would review and conduct  
4 background checks and investigations on everyone in  
5 the White House, and we would occasionally get  
6 reports back or no-gos on some people when their  
7 reports came back as being problematic.

8 Q. And is it correct that that process took  
9 months and most were initially on interim security  
10 clearance? And there's a -- let me not compound  
11 it. Go ahead and answer that.

12 A. Yeah. I mean, some of them took months  
13 and some of them took weeks. I guess it just  
14 depended on, you know, the application. There were  
15 lots that got -- there were some that got rejected  
16 and then there -- in a short period of time, and  
17 some, you know, within months, and then some after  
18 several months. And at that point I left in the  
19 end of July.

20 Q. Fair. Yes.

21 And is it your understanding that in  
22 this, what the FBI is looking for mainly are  
23 individuals that show, let's say, weaknesses or  
24 things in their background that could be  
25 susceptible to blackmail?



1 MR. BLUMETTI: Objection to form.

2 THE WITNESS: Yeah, I can't answer to  
3 what they look for or what decisions they make  
4 or how they make them. It could be a lot of  
5 things.

6 BY MS. DELGADO:

7 Q. Are you familiar with the name Tricia --  
8 let's see if I pronounce it correctly here, hang on  
9 one second -- Tricia Newbold?

10 A. No.

11 Q. Okay. Let me e-mail to the court  
12 reporter, if I may, I want to send you something to  
13 look at.

14 MS. DELGADO: So this will be Exhibit 4,  
15 I think. Okay. Wonderful.

16 (Sharing screen.)

17 (Thereupon, Plaintiff's Exhibit No. 4  
18 was marked for identification.)

19 BY MS. DELGADO:

20 Q. So, Mr. Priebus, if you could -- if the  
21 court reporter could flip to page 2. Or actually,  
22 let's start -- I'm sorry. Start on page 1 because  
23 I want to explain what this is.

24 What you're looking at, Mr. Priebus,  
25 this is a public document, and it's a memorandum





1 from April 2019 by the Congressional House  
2 Committee on Oversight and Reform. And it's the  
3 testimony of a Ms. Tricia Newbold, and she's a long  
4 time executive branch employee within the federal  
5 government, and she works for the personal security  
6 office in the White House.

7 And if the court reporter could go to  
8 page 2, I'd like you to look at the fourth, that's  
9 number 4, full paragraph which starts "Ms. Newbold  
10 explained that..." Do you see that?

11 A. Yeah, I see it.

12 Q. Okay. I'm just going to read aloud into  
13 the record. (As read): "And Ms. Newbold explained  
14 that starting in 2018 she began to keep a list of  
15 the White House employees whose denials were  
16 overturned. Her list eventually grew to 25  
17 individuals, including two senior White House  
18 officials, as well as contractors and individuals  
19 throughout different components of the executive  
20 office of the President. According to Ms. Newbold,  
21 these individuals had a wide range of serious  
22 disqualifying issues involving foreign influence,  
23 conflicts of interest concerning personal conduct,  
24 financial problems, drug use, and criminal  
25 conduct."



1 Now, I know she's referencing that she  
2 started taking this list in 2018 and that's past  
3 your tenure, but some of these -- although she  
4 started keeping the list in 2018, some of these are  
5 from 2017, 2018, 2019.

6 Does any of that ring a bell to you,  
7 what she speaks of?

8 **A.** No.

9 **Q.** So you don't know of any individuals  
10 whose White House security clearance was a no go,  
11 as you called it earlier, yet they were allowed to  
12 work in the White House?

13 **A.** The only one that I thought was having a  
14 security clearance issue was Anthony Scaramucci,  
15 and I don't know how that ended up. I know there  
16 was an issue, but I don't know if it was resolved  
17 or what. But that's the only name --

18 **Q.** What was his position?

19 **A.** I don't remember. But I remember there  
20 was a holdup, and it may have just been because he  
21 had so much -- a lot of financial disclosures to  
22 make. So I don't know what the issue was or how it  
23 was resolved.

24 There may have been a couple other  
25 security clearance issues that were being worked on



1 and discussed by White House counsel. I  
2 occasionally had conversations with Don McGahn  
3 about where we were at on security clearances, but  
4 he was handling it, and we weren't at the point to  
5 anything being real problematic until, of course, I  
6 left and then I kind of, obviously, had nothing to  
7 do with it anymore.

8 Q. Well, we spoke earlier of Raj Shah; do  
9 you recall that?

10 A. Yes.

11 Q. Okay. You were aware because he came  
12 from your RNC group, right?

13 A. I'm aware of him.

14 Q. Okay. But you said you didn't hire him  
15 yourself?

16 A. No.

17 Q. Okay. Were you aware that Mr. Shah  
18 was -- had been arrested just a few years earlier  
19 in New Mexico for aggravated DWI?

20 A. Not that I recall, no.

21 Q. Was he not submitted to a background  
22 check?

23 A. I'm sure he was on his onboarding.

24 Q. So did he not list this on his  
25 background check, or...



1           **A.** I don't see everyone's background  
2       checks. I mean, they do the background check and  
3       the SF 86, the interviews with the DOJ and the FBI  
4       overseen by White House counsel and White House  
5       operation, so I'm not in the middle of everybody's  
6       background checks.

7           **Q.** Because he had a pretty senior role,  
8       right, deputy White House press secretary?

9           MR. BLUMETTI: Objection to form.

10       BY MS. DELGADO:

11       **Q.** Isn't that a very senior role?

12       **A.** I don't consider that to be a very  
13       senior role, no.

14       **Q.** Okay.

15       **A.** Press secretary is a senior role. Comms  
16       director is a senior role. Deputy, no.

17       **Q.** I see. Thank you for explaining how you  
18       define "senior role."

19               Now, this comes up in even Google,  
20       Mr. Shah, so how were you not aware of this?

21       MR. BLUMETTI: Objection to form.

22       THE WITNESS: I guess I didn't Google  
23       it.

24       BY MS. DELGADO:

25       **Q.** But I would think the FBI did. Do you



1 have any reason to think the FBI didn't do their  
2 due diligence on Mr. Shah?

3 A. I have no reason to believe they didn't.

4 Q. Do you think it's appropriate for  
5 someone with a DWI or DUI to work in a White House?

6 MR. BLUMETTI: Object to form.

7 THE WITNESS: I mean, I guess it depends  
8 on the situation.

9 BY MS. DELGADO:

10 Q. Are you aware of how many individuals,  
11 including children, are killed daily through  
12 individuals who drive impaired?

13 A. Sure. And I think it's terrible.

14 Q. But you're okay with someone who  
15 committed that offense, working in the highest --?

16 A. That got a DUI?

17 Q. Hmm-hmm.

18 A. You mean like Bush 43?

19 Q. He was elected, wasn't he?

20 A. Yeah, I know -- whether or not it's  
21 disqualifying. It would be up to, you know, the  
22 individuals, the situation, the review board, you  
23 know, that at the FBI and the DOJ to make that  
24 determination, and ultimately, the folks that are  
25 doing, you know, the vetting.



1 Q. Right.

2 So you feel -- something in someone's  
3 background isn't automatically disqualifying, that  
4 it depends on the context and those doing the  
5 investigation; is that correct?

6 A. I think it depends on the investigators  
7 and the situation, sure.

8 Q. So an offense where individuals,  
9 including children, could have been killed, you  
10 don't feel is automatically disqualifying?

11 MR. BLUMETTI: Objection to form.

12 THE WITNESS: I don't know. It just  
13 depends on the situation. I mean, if someone  
14 had a DUI, you know, years ago and they changed  
15 their life and they showed improvement and rehab  
16 and they are a different kind of person today  
17 than they used to be, then I think it's possible  
18 that that person can have a second chance.

19 BY MS. DELGADO:

20 Q. Do you equate a second chance -- do you  
21 see a second chance as being distinct from working  
22 in the White House?

23 A. I think people could have second  
24 chances. And I think everyone could have a second  
25 chance in life no matter what's going on. I mean,



1 I guess it depends on how horrible it is. But I  
2 mean, I think generally second chances can be  
3 appropriate under the right circumstances.

4 Q. So in your opinion, a DUI of Mr. Shah's  
5 from just a few years back would not automatically  
6 and should not automatically disqualify him from  
7 employment in the White House?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: It may or may not. I  
10 mean, if I would have known about it, maybe it  
11 would have.

12 BY MS. DELGADO:

13 Q. So just to be clear, Mr. Shah was hired  
14 for the White House despite a DUI a few years  
15 earlier, which you claim you weren't aware of, and  
16 having referred to the President he will be serving  
17 as, quote, a deplorable, according to reports, and  
18 the *Access Hollywood* paper release as "justice",  
19 according to reports, and having dug up  
20 embarrassing footage of the President he is to  
21 serve just a year earlier, according to reports,  
22 and he was hired for the White House.

23 Is that -- did I get that right? Was  
24 anything inaccurate there?

25 A. You'd have to ask -- you'd have to ask



1 Sean that question. I mean, it's...

2 Q. Sure.

3 And also to be clear, Mr. Shah's -- I  
4 want to make sure I'm not missing some Stellar  
5 Oxford education or something in his background,  
6 his role at the RNC was just opposition research,  
7 right?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: He was a -- you'd have to  
10 ask -- I don't remember his exact title, but he  
11 was heading up the research department, which is  
12 a communications role at the RNC in the  
13 communications shop. He may have been doing --  
14 BY MS. DELGADO:

15 Q. Okay. Let's --

16 A. He may have been doing press work as  
17 well during the time that he was head of research.

18 Q. Can we talk a bit about Helen Aguirre  
19 Ferre? Do you remember Helen?

20 A. No.

21 Q. You don't remember Helen, a Latina woman  
22 from Miami?

23 A. What was the last name?

24 Q. Helen Ferre. Ferre, as you would say.

25 A. Yeah. Can you spell it?



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705



1 Q. F-e-r-r-e.

2 A. I don't.

3 Q. Okay. Does it ring a bell? She  
4 referred to Trump as a, quote, street dog and  
5 anti-female during the primaries. She worked for  
6 the RNC. That's why I'm surprised you don't  
7 remember.

8 A. I don't remember. Maybe vaguely. Now  
9 you kind of like stirred my memory a little bit.  
10 Vaguely.

11 Q. Okay. And I'm happy to show you the  
12 article where she referred to Mr. Trump as such,  
13 but explain to me, how does someone who referred to  
14 Mr. Trump as a "street dog" and as "anti-female"  
15 then get a job in the White House?

16 MR. BLUMETTI: Objection to form.

17 THE WITNESS: Because the people doing  
18 the hiring decided that she should be hired. I  
19 don't know. I don't remember her, and I don't  
20 know her.

21 BY MS. DELGADO:

22 Q. Okay. Do you remember Stephanie  
23 Grisham?

24 A. I remember who she was after we started  
25 in the White House.



1 Q. Okay. And, you know, we've been talking  
2 about security clearances. I want to show you  
3 something else.

4 MS. DELGADO: This will be Exhibit 5.

5 (Thereupon, Plaintiff's Exhibit No. 5  
6 was marked for identification.)

7 (Sharing screen.)

8 BY MS. DELGADO:

9 Q. Let's see here. Give me one second.  
10 I'm sorry. Okay. Okay. And just stop there.

11 Mr. Priebus, that person had what you  
12 consider a senior role in the White House, right?

13 A. It was -- I think she came in, in the  
14 First Lady's office.

15 Q. Hmm-hmm. And later became White House  
16 press secretary, a cabinet member, correct?

17 MR. BLUMETTI: Objection to form.

18 THE WITNESS: That's not a cabinet  
19 member, but --

20 BY MS. DELGADO:

21 Q. Oh --

22 A. -- she did become press secretary.

23 Q. My bad.

24 And also White House comms director?

25 A. I believe so. It would have been way

1 after I left.

2 Q. Sure.

3 But she was working there when you were  
4 chief of staff, correct?

5 A. She was a -- what they call a "press  
6 wrangler."

7 Q. I have that she was a deputy press  
8 secretary. I can send you that --

9 A. I don't know.

10 Q. -- if you'd like.

11 A. I don't know what her title was  
12 initially.

13 Q. In fact, she worked right underneath  
14 Sean Spicer; is that correct?

15 A. So I think everyone would have worked  
16 below Sean Spicer in the comm shop.

17 Q. So if we could go back to the question:  
18 How does someone with two arrests, recent ones,  
19 including during the campaign, because one is from  
20 2015, how does that person pass the vetting?

21 A. You'd have to talk to the DOJ and the  
22 FBI.

23 Q. So it appears, based on her passing the  
24 vetting, that this was not disqualifying?

25 A. I don't know if she passed the vetting



1 or not.

2 Q. Sure.

3 So it's possible that even if you didn't  
4 pass the vetting, you could remain working in the  
5 White House, correct?

6 A. No, I don't know the state of her  
7 security clearance or when it was cleared or if it  
8 was cleared or what the status was of it.

9 Q. Well, she was in the White House four  
10 months -- four years, Mr. Priebus?

11 A. Then you could assume that she either  
12 got a security clearance or somehow had passed the  
13 vetting.

14 Q. So, again, criminal records and DUIs  
15 where individuals could be killed were not  
16 disqualifying in a Trump administration.

17 MR. BLUMETTI: Objection, form.

18 BY MS. DELGADO:

19 Q. And individuals with such criminal  
20 backgrounds worked there while you were chief of  
21 staff; is that correct?

22 A. I don't know, because I wasn't -- I  
23 don't know what their background is. So you're  
24 telling me these things and I don't really know  
25 what's true and not, and I don't know what the FBI



1 and the DOJ were doing or reviewing, so it's hard  
2 to answer.

3 Q. Were you aware of this?

4 A. Was I aware of the deputy press  
5 secretary having a DUI in 2013, no.

6 Q. What about the DUI in 2015?

7 A. No.

8 Q. No one brought this to your attention as  
9 chief of staff?

10 A. No.

11 Q. Okay.

12 Would you say a college degree would be  
13 necessary for a deputy press role?

14 A. Not necessarily.

15 Q. And Ms. Grisham, after she left the  
16 White House, wrote a best selling book; is that  
17 correct? Does that ring a bell?

18 A. I remember she wrote a book.

19 Q. I'm going to show you, I think,  
20 Exhibit 6.

21 (Thereupon, Plaintiff's Exhibit No. 6  
22 was marked for identification.)

23 (Sharing screen.)

24 BY MS. DELGADO:

25 Q. Okay. Okay. Who is that, Mr. Priebus?



1 A. That looks like Boris.

2 Q. Okay. And I don't know if you could  
3 read what's on there, but would it be correct to  
4 say that's from his arrest?

5 A. It looks like it.

6 Q. Which was for violent assault?

7 A. That's what it says.

8 Q. Okay. How does that individual work in  
9 your White House?

10 MR. BLUMETTI: Objection to form.

11 BY MS. DELGADO:

12 Q. How does -- let me rephrase.

13 How does an individual with a criminal  
14 record and a mugshot work in a Reince Priebus led  
15 White House?

16 A. The people that -- other -- like I said,  
17 I'm one of many people that influenced and tried to  
18 build a White House staff, cabinet, Trump  
19 administration, and there are lots of folks that  
20 have influence. And the people that were hired or  
21 not hired is a result of many people including  
22 department heads and the people that are building  
23 their teams and putting together their teams that  
24 they want to work with subject to background  
25 checks, White House ops, and White House counsel.



1 Q. Sure.

2 But we've heard from your co-defendant a  
3 lot about security clearance and vetting and how  
4 important that process is in disqualifying  
5 candidates, so I guess I'm just asking how is it  
6 you have Raj Shah, Stephanie Grisham, Boris  
7 Epshteyn, all criminal records, this isn't just  
8 something embarrassing, but criminal, DUIs that can  
9 kill people, how do they -- do you have any idea  
10 how they passed the vetting, but Mr. Spicer says I  
11 wouldn't? I'm asking you if you know why they are  
12 unique or special?

13 A. I just answered it. Because there are a  
14 lot of people making hiring decisions and there's a  
15 lot of people that -- that worked together to try  
16 to build the staff and the teams that ultimately  
17 got to the White House and they got there.

18 Q. Again, I don't think that's actually  
19 answering my question, though, to how -- that's not  
20 about why they were hired. I understand that's  
21 what you're answering.

22 How do they pass security vetting, in  
23 your opinion?

24 A. You'd have to ask the DOJ and the FBI.  
25 I am not part of the vetting process when it comes



1 to national security and vetting by the DOJ and the  
2 FBI. They come back with their results and either  
3 they get an up or down result or it goes for  
4 further review.

5 By the time I left the White House,  
6 99 percent of these matters were still being  
7 reviewed. So Don McGahn was dealing with all of  
8 this and everyone coming in the White House was  
9 subject to vetting, review, and a security  
10 background check, and that was the process.

11 Q. Fair enough.

12 So would you say -- you said when you  
13 left 99 percent of these were still in the pipeline  
14 as they were, which that makes pass.

15 A. I don't -- I misspoke. I don't know  
16 what percentage were in the pipeline. There were  
17 lots in the pipeline. Don McGahn. Another guy,  
18 his last name was Karrol, who was in charge of all  
19 of the vetting and all the reviews of every  
20 employee was working on these matters. If someone  
21 was problematic and it was someone that was being  
22 asked to leave based on a background check, they  
23 would handle it.

24 Q. And you said when an individual would  
25 receive an up or down, it would then -- it





1 occasionally or always or sometimes be subjected to  
2 further review?

3 A. Sometimes I believe it went to further  
4 review through the FBI and the DOJ, and sometimes  
5 people got a thumbs down pretty quickly, and by the  
6 time, you know, this stuff came to a head, I was  
7 gone.

8 Q. So you weren't aware of Boris' arrest  
9 and criminal past?

10 A. No.

11 Q. Who hired Boris?

12 A. It would have been through the press  
13 shop.

14 Q. He worked, okay, for surrogate  
15 operations. So that would have been Sean hired  
16 him?

17 A. I would assume so.

18 Q. So would Sean have likely known about  
19 this arrest?

20 A. I have no idea.

21 Q. Well, what's the date on that article?

22 A. The article is the 17th of -- or  
23 March 10th, 2017.

24 Q. Okay. I'm going to circle back with  
25 another article about that, but I don't want to



1 hold this up on the exhibits, so we'll circle back  
2 to that.

3 Were you aware Boris was arrested a  
4 couple years ago for groping a woman or women,  
5 allegedly, in a bar?

6 A. I may have heard it, but I didn't pay  
7 attention to it.

8 Q. Does the name Max Miller ring a bell?

9 A. Yes.

10 Q. And he served in the White House when  
11 you were there, right?

12 A. I think so.

13 Q. Did Max have a criminal record?

14 A. I don't remember him particularly,  
15 maybe. I mean, I know who he was, but I don't  
16 remember at the time working with him, or I don't  
17 remember much of him.

18 Q. Okay. I could -- I can just slow things  
19 down with another exhibit or I can tell you that he  
20 had a criminal record including charges of assault,  
21 disorderly conduct, and resisting arrest prior to  
22 the White House.

23 So same question, how does an individual  
24 like Max Miller pass vetting?

25 A. You have to ask the people doing the



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

1 vetting.

2 Q. Right.

3 A. So when people get a job in the White  
4 House, the first thing they do, one of the first  
5 things is they go to be vetted. They go to White  
6 House operations. They fill out all their personal  
7 information about themselves. It's like, you know,  
8 75 pages of background that then gets reviewed by  
9 White House counsel, the DOJ, and the FBI.

10 We don't have -- you know, that is the  
11 vetting of the White House. And as matters come  
12 up, the White House counsel works through those  
13 issues with each person or with the FBI, and at  
14 some point either someone has a security clearance  
15 and they pass or they don't. That's how it works.

16 Q. So if Sean Spicer stated that I wouldn't  
17 have passed security clearance, you disagree with  
18 that because your position is, that's not a  
19 determination we made; that's up to the FBI and the  
20 DOJ and the folks who do that, correct?

21 A. I didn't make the determination as to  
22 whether you had passed or not, right? You know, so  
23 I don't -- I don't know enough about you to even  
24 have an opinion.

25 Q. So when I asked you your opinion on the



1 others, you said you can't give an opinion because  
2 that wasn't your role or your wheelhouse. So how  
3 would you have an opinion on mine? How does Sean?

4 A. I don't have an opinion on yours. I  
5 mean, I don't know anything about you.

6 Q. Can we talk about John McEntee?

7 A. Sure.

8 Q. That's another one who was in the White  
9 House for over a year before the security clearance  
10 issues of his came to light, correct?

11 MR. BLUMETTI: Object to form.

12 THE WITNESS: I don't know.

13 BY MS. DELGADO:

14 Q. I can show you an article, if you'd  
15 like, to refresh your recollection that he departed  
16 in March of 2018 after serving 15 months in the  
17 White House.

18 So my question is, weren't there also  
19 individuals who despite having questionable issues  
20 that, in McEntee's case, could subject them to  
21 blackmail, that being extreme gambling issues,  
22 nonetheless, were able to serve in the White House  
23 because it did take so long for these vettings, in  
24 some cases, to be completed? Is that accurate?

25 And I can show the article if you'd like



1 so that you don't have to take --

2 A. No, I'm -- I'm aware of the general  
3 incident, so I don't question that. I just -- the  
4 DOJ and the FBI are the ones that are -- and the  
5 White House counsel are the folks that are doing  
6 and conducting these background checks, so I'm not  
7 the expert to answer your questions as far as what  
8 the process is, how it works, how long, you know.  
9 I'm just not an expert on that particular process.

10 Q. Fair enough. Fair enough.

11 Bear with me here. One more exhibit, I  
12 mean. Okay.

13 (Thereupon, Plaintiff's Exhibit No. 7  
14 was marked for identification.)

15 MS. DELGADO: These are three  
16 exhibits I'm sending. Well, 12, is it?  
17 Sorry, one of my clocks, I never  
18 changed it.

19 (Sharing screen.)

20 BY MS. DELGADO:

21 Q. Okay. So this is a headline from *Slate*  
22 from February 2018 and it talks about the year  
23 2017. And I hope you can see the headline. I'll  
24 read it into the record. It says, "Rob Porter's  
25 history of domestic abuse wasn't a secret. It's



1 just that no one cared."

2 The cops, the FBI, and the White House  
3 chief of staff all knew, and he still continued to  
4 rise through the ranks of our government's highest  
5 office. Have you seen this article, Mr. Priebus?

6 A. No. No.

7 Q. It mentions you by name and never -- no  
8 one ever showed it to you? It didn't come up on  
9 your Google alerts, nothing?

10 A. It mentions my name?

11 Q. I believe so, yes.

12 A. Where?

13 Q. Let's see. I'm trying to bring up the  
14 link. It might be in a separate article.  
15 Actually, it's not this article that mentions you.  
16 I apologize. I take that back. It's the other  
17 one, and I didn't link that one. So never mind  
18 that question.

19 Did you know about Rob Porter's history  
20 of domestic abuse?

21 A. No.

22 Q. When did you become aware? Now?

23 A. When it -- when it came out in the  
24 press. When it exploded in the press.

25 Q. And to make sure we both heard the same



1 thing and we were both aware of the same thing,  
2 two, not just just one, of his ex-wives claimed  
3 that he was physically abusive. And if the court  
4 reporter could kindly throw up on the screen  
5 exhibit -- the third exhibit I sent. We'll mark  
6 that as Exhibit 8.

7 (Thereupon, Plaintiff's Exhibit No. 8  
8 was marked for identification.)

9 (Sharing screen.)

10 BY MS. DELGADO:

11 Q. So according to one of Rob Porter's  
12 ex-wives, we have up on the screen a picture, a  
13 photo of a Ms. Colbie Holderness. She was Rob  
14 Porter's first wife who claims she was a victim of  
15 his beating. Rob Porter --

16 Well, let me just ask you: Have you  
17 seen this photo before, Mr. Priebus?

18 A. No.

19 Q. Okay. Were you --

20 A. I've seen similar pictures in other  
21 publications. I don't know about this one, but,  
22 you know, I'm aware of this story.

23 Q. Okay. So you're aware that two ex-wives  
24 spoke to the FBI when he was hired about --

25 A. I don't know --



1 Q. -- 2000 --

2 A. I don't know when they spoke to the FBI,  
3 but...

4 Q. That they claim they did. I should  
5 rephrase that.

6 A. Yeah, and I don't -- and I don't know  
7 when. I think this story broke out sometime after  
8 I left, maybe a couple years after I left.

9 Q. They broke out in February of 2018.

10 A. Okay. Well --

11 Q. It was after you left, but it concerns  
12 the period when you were there because they spoke  
13 to the FBI.

14 A. No, it doesn't -- it doesn't concern the  
15 period when I was there. It's just that the  
16 security clearance issues started when I was there.  
17 They just didn't conclude when I was there.

18 Q. Correct. Absolutely. Fair enough.

19 (Thereupon, Plaintiff's Exhibit No. 9  
20 was marked for identification.)

21 (Sharing screen.)

22 BY MS. DELGADO:

23 Q. But how is it Mr. Porter was even  
24 through your tenure working under you? And our  
25 next exhibit is a photo of you in the West Wing and





1 oval office, you and Mr. Porter with Mr. Trump.

2 How did Mr. Porter manage to work in the  
3 White House for a year and change, including all  
4 seven months of your tenure, with that in his  
5 background?

6 MR. BLUMETTI: Objection to form.

7 THE WITNESS: Because the people doing  
8 the background checks and the reviews don't  
9 conclude their reviews immediately. And I  
10 didn't know about it, and I don't -- I don't  
11 think anyone knew about it. So it was a shock  
12 to a lot of people, and after they apparently  
13 heard the reports, after the DOJ and FBI went  
14 through, you know, domestic files in the  
15 counties in Virginia, maybe that's how they  
16 found it. But certainly wasn't anything anyone  
17 else knew about.

18 MS. DELGADO: And that's the Exhibit 9  
19 there, the photo.

20 BY MS. DELGADO:

21 Q. So to make sure I understand what you  
22 just said correctly, you once again, as you alluded  
23 to and specifically mentioned earlier, these  
24 background checks can sometimes take a very long  
25 time, is what you're saying?



1 A. Yes.

2 Q. Fair enough.

3 And even though Rob Porter had a  
4 domestic violence restraining order, which was made  
5 aware to the FBI early on when he was hired,  
6 allegedly by the ex-wife who obtained the  
7 restraining order, it nonetheless appears to have  
8 taken over a year, including after you were gone,  
9 to investigate this; is that correct?

10 A. Yeah, I don't -- I don't know what steps  
11 were taken in dealing with the security clearance  
12 issues, but almost none of the issues that were  
13 pending were resolved or coming to the conclusion  
14 of being resolved before I actually left. So White  
15 House counsel --

16 Q. So no one ever -- oh, I'm sorry. Go  
17 ahead.

18 A. -- White House counsel and the folks  
19 there in operations would be the people who would  
20 know the ins and outs of what the DOJ and the FBI  
21 was doing in regard to these background checks.  
22 And the people that came after me would know maybe  
23 to the point where they were being briefed on where  
24 these different issues were at.

25 Q. Fair enough.



1 It wasn't brought to your attention  
2 during your seven-month tenure --

3 A. No.

4 Q. -- is that correct?

5 A. That's right.

6 Q. Do you believe it was brought to Don  
7 McGahn's attention?

8 A. I don't know if it was or not.

9 Q. Do you believe --

10 A. It would have been someone in his  
11 office.

12 Q. Uh-hmm. Do you believe it would have  
13 been brought to Hope Hicks' attention, or was?

14 MR. BLUMETTI: Objection.

15 THE WITNESS: I have no idea.

16 BY MS. DELGADO:

17 Q. Do you feel it strains -- do you feel  
18 it's a stretch that it would take a year and two  
19 months to adjudicate the security clearance of  
20 someone who allegedly beat up a wife pretty badly?  
21 In your opinion, why would that take a year and two  
22 months?

23 MR. BLUMETTI: Objection to form.

24 THE WITNESS: I have no idea.

25 BY MS. DELGADO:



1 Q. No idea.

2 Do you believe that Trump --

3 A. It seems like a long time. It seems  
4 like a long time, but I have no idea.

5 Q. Mr. Porter had a Harvard law degree, did  
6 he not?

7 A. I believe that he did.

8 Q. In your experience with Mr. Trump and  
9 his constant boasting of his Wharton degree and of  
10 others' Ivy League credentials, would it be fair to  
11 say Mr. Trump places a premium on that?

12 MR. BLUMETTI: Object to the form.

13 MS. DELGADO: I'm asking for his  
14 opinions.

15 THE WITNESS: I mean, perhaps. I mean, I  
16 went to the University of Wisconsin at  
17 Whitewater, so not exactly Harvard.

18 BY MS. DELGADO:

19 Q. Hey, that's okay. That's okay.

20 I'm just asking you -- I'm just asking  
21 about Mr. Trump.

22 A. And the University of Miami in Florida,  
23 so that wasn't bad.

24 Q. I'm just asking about Mr. Trump's  
25 perception, not saying it's correct or not.



1           **A.** Yeah, I mean, sure. I mean, I don't  
2 know. It certainly wouldn't be a defining item for  
3 somebody, but it couldn't hurt.

4           **Q.** And I will -- I'll spare you if you're  
5 okay with my not having to show it, to not slow  
6 things down because we're close to being done, but  
7 there's a *Wall Street Journal* article about Rob  
8 Porter and this situation where it's reported that  
9 in early 2017 this was brought to Don McGahn's  
10 attention.

11           So, again, if your answer is "I don't  
12 know," that's fine. But I have to ask: Any clue  
13 why it took over a year for that security -- why he  
14 was allowed to work in the West Wing with an  
15 interim security clearance?

16           First of all, let me just ask you that.  
17 How was he allowed to work in the West Wing in the  
18 oval office when you were chief of staff with an  
19 interim security clearance?

20           **A.** You'd have to ask the people that  
21 understand how interim security clearances work. I  
22 think it's a specific -- there's a specific way  
23 that that is done and reviewed. But no one ever  
24 brought to the attention of me, or I would highly  
25 doubt anyone even remotely around me, about the



1 fact that there was some kind of domestic abuse  
2 accusation against Rob Porter. The first I heard  
3 of it was when it blew up in the West Wing and that  
4 was it.

5 Q. So individuals were able -- Rob Porter  
6 being at least one example, were able to work in  
7 the White House for months, even a year or longer  
8 with interim security clearances; is that correct?

9 A. You'd have to find out what the level of  
10 their clearance was. I mean, it isn't -- it's  
11 handled by the FBI and the DOJ and the White House  
12 counsel's office. It's not -- there's a specific  
13 process that I think is, you know, detailed,  
14 specific step-by-step method that they use, and I'm  
15 not the person to be able to explain to you how  
16 temporary security clearances work.

17 Q. Right. Yeah, and I don't want you to  
18 explain it. I know that's a detailed request. I  
19 wouldn't make that of you.

20 It's just, were you aware of individuals  
21 with interim security clearances working in the  
22 West Wing or in the White House overall?

23 A. Well, I was one.

24 Q. You were one. Oh, okay.

25 Okay. How long was it --



1           **A.** I mean, I think -- I mean, it's -- I  
2           think -- I mean, I was probably a few months. I  
3           mean, it takes a few months before you get your  
4           permanent.

5           **Q.** Sure, sure, and that makes sense.

6                       And so I guess that circles back to what  
7           we were saying, using Boris as an example. What I  
8           was asking about that is, sometimes then even just  
9           being in the White House, as Boris was able to  
10          parlay into a lucrative and prestigious  
11          communications role, even if you're going to fail  
12          your security clearance, some individuals snuck in  
13          there for a while, didn't they, like Porter?

14                      MR. BLUMETTI: Objection to form.

15                      THE WITNESS: I suppose.

16           BY MS. DELGADO:

17                      **Q.** Okay. Do you believe the Trump  
18           administration -- this is just your personal  
19           opinion -- do you believe Mr. Trump -- I'll limit  
20           it to Mr. Trump at first, do you believe Mr. Trump  
21           cares about domestic violence?

22                      **A.** Yeah, I think so.

23                      **Q.** Why is it then that when Porter, this  
24           all came out, he nonetheless spoke highly of Rob  
25           Porter?



1           **A.** I have no idea. You got to ask him. I  
2       wasn't even there.

3           **Q.** Do you have any reason or information or  
4       understanding of why Mr. Trump keeps Jason Miller  
5       in his orbit despite the allegations of Jason  
6       Miller having been physically and sexually abusive  
7       with me?

8           **A.** I don't know. You're going to have to  
9       ask the President.

10          **Q.** Okay. Maybe I will.

11                Okay. Let's see. I think we're close  
12       to being done, but -- well, on the -- on the  
13       security clearances, just again if you don't know,  
14       because I'm asking you about someone else's  
15       testimony, but do you have any reason to believe or  
16       understand why Mr. Spicer was so adamant that I  
17       wouldn't have been able to work in the White House  
18       due to security clearance, but someone like Rob  
19       Porter did for a year and change? Any idea why?

20          **A.** I don't know what the differences are or  
21       the details or the distinguishing reasons. You  
22       have to ask Sean, I mean.

23          **Q.** Was there a different standard for  
24       women?

25                MR. BLUMETTI: Object to form.





1 THE WITNESS: No. Everyone had to fill  
2 out the same stuff no matter who you were.

3 BY MS. DELGADO:

4 Q. Right.

5 But when stuff, as when the SP 86 came  
6 back with something eh, was there a different  
7 standard for women or for Hispanics or for any  
8 category --

9 A. No.

10 Q. -- based on whether it was a problem or  
11 not?

12 A. No, of course not.

13 Q. You have no reason -- your belief is  
14 that everyone was treated the same when it came to  
15 security clearance?

16 A. Yeah. Yes.

17 Q. You don't believe Rob Porter -- okay.  
18 Okay. Fair enough.

19 A. If I -- listen, we got people like --  
20 you know, that we are dealing with that came well  
21 after me.

22 Q. Right. But it was brought to Don  
23 McGahn's attention, the security clearance of Rob  
24 Porter began while you were chief of staff.

25 A. I don't know if that's true or not. I



1 don't know that. You've got to ask Don McGahn when  
2 the date was. I mean, you could --

3 Q. Oh, no, that's what we're here to do.  
4 I'm asking you if you were aware of it, and you've  
5 testified that you were not aware --

6 A. No.

7 Q. -- of any allegations. That possibly  
8 Don McGahn was, but you yourself was not.

9 A. I don't know what Don McGahn knew or  
10 when he knew it, and I know I was not aware of it  
11 until it exploded in the press.

12 Q. So you have no reason to believe that my  
13 security clearance would have been treated any  
14 differently than anyone else's?

15 A. I think your security clearance would  
16 have been treated the same, and I don't know how it  
17 would have turned out because I don't know anything  
18 about your background, and I don't -- I'm not an  
19 expert at understanding how that process works.

20 Q. And two individuals who were,  
21 quote-unquote, if I may use the term "shown the  
22 door" over security clearances that I found, one  
23 was Justin Caporale; is that correct?

24 A. I know -- I know of him, but I didn't  
25 realize that he was released because of security



1 clearance.

2 Q. I believe it was in one of the books by  
3 someone who served with him and what was reported  
4 in the book, if I recall correctly -- and please  
5 let me know if this rings a bell, this is why I'm  
6 asking, is it -- was because it was the kind of  
7 thing that -- that made someone susceptible to  
8 blackmail, and that was that he had a secret  
9 profile on Grindr? Does that ring a bell?

10 A. That doesn't ring any bell.

11 Q. Okay. And the other who was let go was  
12 the daughter of Susie Wiles, who currently runs the  
13 campaign, Caroline Wiles, and that was for drug  
14 use, which the FBI also feels leads to potential  
15 for blackmail. Does that ring a bell?

16 A. A little bit.

17 Q. Uh-hmm. Do you remember Lynne Patton,  
18 who was Eric Trump's wedding planner, getting a job  
19 in the administration?

20 A. I don't remember her getting -- well,  
21 maybe in some other department, maybe like in  
22 another like cabinet type of post. Or not a  
23 cabinet position, but working for a cabinet  
24 secretary somewhere, I have a recollection of that.  
25 I just can't remember exactly who.



1 Q. Yeah, I believe it was running HUD, the  
2 housing authority. Does that ring a bell?

3 A. It rings a bell.

4 Q. So how does someone whose background is  
5 as a wedding planner get a job in the Trump  
6 administration? Any thoughts?

7 A. I don't know. I mean, you know, there's  
8 thousands of jobs. I mean, I don't know what to  
9 tell you. I don't know. Nothing that --

10 Q. And you have no reason to think I  
11 wouldn't have qualified for at least one of those,  
12 right?

13 A. It's up to you. I mean, I'm not sure  
14 what all you applied for. I don't know.

15 Q. Wouldn't you say at the end of the day a  
16 lot of these jobs, and perhaps that's true in all  
17 administrations, but I think particularly the way  
18 Mr. Trump operates, came down to whether Mr. Trump  
19 and the Trump family liked you; is that accurate?

20 A. I don't think that that's always  
21 accurate. I mean, I just -- there are thousands  
22 and thousands of jobs, and presidential personnel  
23 vets everybody and tries to match people up for  
24 what's needed and who people want and who people  
25 want to hire. I think there's a lot of



1 personalities and opinions that go into it.

2 Q. Sure. And obviously, with thousands of  
3 jobs, they're not going to know even a fraction of  
4 that. If I could restate it then.

5 Does knowing the Trump family and being  
6 well liked by Mr. Trump help in obtaining a White  
7 House job?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: I mean, being liked  
10 certainly helps.

11 BY MS. DELGADO:

12 Q. Right. Okay.

13 A. I mean -- I mean, being disliked can't  
14 help, I mean, obviously.

15 Q. Well, wasn't Boris hired, who was widely  
16 disliked?

17 A. Oh, I don't know. I didn't pick that  
18 up. You-all knew far more on the ins and outs and  
19 the personalities of the campaign than we did.

20 Q. Okay. I have one more thing to show  
21 you, which I didn't plan on using, but something  
22 you said, I should use that as an exhibit and ask  
23 about it.

24 If you'd like to take the time now to  
25 talk to Mr. Blumetti about the Boris issue, I



1 believe it was.

2 A. Yeah.

3 Q. If you're able to share or detail what  
4 the privilege is there or the confidentiality is  
5 there while I get this exhibit ready, that way we  
6 can speed things along and close to being done.

7 A. All right. Let me put myself on mute,  
8 and I'll give you a call.

9 Q. Yes. Be sure to put me on mute. I  
10 don't need to hear it.

11 (At this time a recess was taken.)

12 THE STENOGRAPHER: Okay. Back on the  
13 record.

14 (Thereupon, Plaintiff's Exhibit No.  
15 10 was marked for identification.)

16 THE STENOGRAPHER: Did you want to  
17 share that e-mail?

18 MS. DELGADO: Yes.

19 BY MS. DELGADO:

20 Q. Let me preface it first.

21 Mr. Priebus, you said something earlier,  
22 and this is the whole point of depositions, is to  
23 learn, that you had heard that Hope Hicks, and I  
24 wrote down what you said here, you said, "Someone  
25 told me Hope Hicks had said she wouldn't have gone



1 in if you went in;" is that correct?

2 A. Yeah, I don't know when I heard it. If  
3 it was before or after during the transition, I  
4 don't know, or afterwards, or if Sean told me that,  
5 I don't know.

6 Q. And who said that?

7 A. I don't remember who said it. I just  
8 heard that from somewhere.

9 Q. Okay. If we could show the attached.

10 (Sharing screen.)

11 BY MS. DELGADO:

12 Q. It's a screenshot that I sent the court  
13 reporter of a book -- is what you'll see, of a book  
14 written by Hope's former paramour, Corey  
15 Lewandowski and Dave Bossie. And I've  
16 highlighted -- there are some words highlighted  
17 there.

18 And what that is -- what you're looking  
19 at is a synopsis of an event where -- let me just  
20 read it out loud. "AJ stepped in between Mr. Trump  
21 and the reporter and told the reporter that she  
22 couldn't interview the candidate. The boss didn't  
23 know what was on going on and neither did Hope or  
24 Keith, who had moved Mr. Trump away. A heated  
25 discussion ensued between AJ and the reporter.



1 Once things went sideways, we didn't do the  
2 interview and instead headed straight to the  
3 airplane."

4 MS. DELGADO: Okay. You can remove that  
5 one.

6 BY MS. DELGADO:

7 Q. So as you can see, it's an excerpt  
8 that's not particularly favorable to me. Do you  
9 have or have you heard anything about excerpts in  
10 books being written or anyone being encouraged to  
11 write any false stories about me or portray me in  
12 any false light?

13 A. No.

14 Q. No.

15 Even though Mr. Trump was upset about  
16 what you heard him describe as a frivolous lawsuit  
17 back in 2017?

18 A. No, I've never heard any such  
19 instruction like that.

20 Q. Even if there weren't an instruction,  
21 have you heard of anyone saying anything about me  
22 that was untrue in the public domain or private?

23 MR. BLUMETTI: Objection to form.

24 THE WITNESS: No, not particularly.

25 BY MS. DELGADO:





1 Q. When you say "not particularly," what do  
2 you mean?

3 A. I guess I don't understand your  
4 question. You asked me if I've heard of people  
5 being encouraged to say and write things negatively  
6 about you, and the answer is no.

7 Q. And anything that has been said about me  
8 that you later learned was untrue?

9 A. No.

10 Q. Okay. I want to show you an example,  
11 particularly your having brought up Ms. Hicks. You  
12 just read what was said by Mr. Lewandowski  
13 describing an event I attended with Ms. Hicks,  
14 correct? Which said that I --

15 A. I don't know if I --

16 MR. BLUMETTI: We believe so. We didn't  
17 see anything but the excerpt.

18 BY MS. DELGADO:

19 Q. Yes. I'm sorry. I'm representing, if  
20 that's okay. If you don't object, I'm representing  
21 that it's an excerpt from Mr. Lewandowski and  
22 Mr. Bossie's book, Let Trump --

23 MR. BLUMETTI: What is it called?

24 MS. DELGADO: It's called "Let Trump be  
25 Trump."



1 MR. BLUMETTI: Okay.

2 MS. DELGADO: Okay?

3 BY MS. DELGADO:

4 Q. And as you saw, the excerpt says that I  
5 stepped in, prevented Mr. Trump from speaking with  
6 a reporter, and that I then it says I got into a  
7 heated discussion with the reporter. And the  
8 reporter they are referencing there, by the way,  
9 was this reporter you'll see here, who's now in  
10 Congress, and it was an event at the Bay of Pigs  
11 Museum in Miami.

12 Now I'm going to show you a YouTube  
13 clip --

14 MS. DELGADO: If you could play the  
15 clip, please.

16 BY MS. DELGADO:

17 Q. -- of that exact moment being described  
18 in the book.

19 (Sharing screen.)

20 MS. DELGADO: And if you could  
21 fast-forward, court reporter, to the 50 second,  
22 that refers to the moment --

23 MR. BLUMETTI: That's it.

24 MS. DELGADO: -- that was purportedly  
25 described in a book excerpt.



1 To the 50 second mark. Thank you.

2 Yeah, anywhere around there is good.

3 (YouTube video playing.)

4 BY MS. DELGADO:

5 Q. That's the reporter and that's  
6 Mr. Trump.

7 VIDEO: "That I was thanking him, I  
8 should say, that he was taking this time to talk  
9 to Hispanic media."

10 BY MS. DELGADO:

11 Q. There's Hope Hicks.

12 VIDEO: "Remember, Mr. O'Reilly, that  
13 he had not -- "

14 BY MS. DELGADO:

15 Q. That's me with the blonde hair in the  
16 white dress.

17 VIDEO: " -- spoken to any Spanish  
18 network ever since he became the nominee, so it  
19 was the first time that he was -- "

20 BY MS. DELGADO:

21 Q. You saw Ms. Hicks interfere, the  
22 reporter pulled back --

23 VIDEO: " -- going to talk to us and we  
24 were eager to hear him directly without any  
25 filters."



1 "And there he goes, and yeah, why then  
2 all of a sudden he leaves."

3 BY MS. DELGADO:

4 Q. -- and definitely quietly walks away and  
5 follow Mr. Trump.

6 In that video do you see me engage in a  
7 heated altercation with the reporter?

8 MR. BLUMETTI: Objection. Let the video  
9 speak for itself.

10 MS. DELGADO: Well, I'm asking what he  
11 saw.

12 THE WITNESS: I mean, it didn't appear  
13 so, but I don't know what's going on before that  
14 clip.

15 BY MS. DELGADO:

16 Q. Did I interfere to prevent an interview?

17 A. I don't know. I don't know. I don't  
18 know what was going on.

19 Q. Did you see me interfere between the  
20 reporter and Mr. Trump in that clip?

21 A. Can you play it again?

22 Q. Sure.

23 (Playing YouTube video.)

24 VIDEO: "Walking and was explaining  
25 to him that I was thanking him, I



1           should say, that he was taking this  
2           time to -- "

3       BY MS. DELGADO:

4           Q. Ms. Hicks --

5               " -- talk to Hispanic media.

6           Remember, Mr. O'Reilly, that he..."

7           THE WITNESS: I don't know what  
8           you're -- he looks like he was looking  
9           towards you initially, but you're in a  
10          screenshot, so I don't know what was  
11          going on.

12       BY MS. DELGADO:

13          Q. Correct.

14               So you don't -- there's no interference  
15          from me that you see on there, at least?

16          A. Not that I see on the clip, but you're  
17          not in the whole clip, and I don't know what's  
18          going on before the clip.

19          Q. Fair enough. I'm not --

20          A. I think it's unclear.

21          Q. I can't show the entire day.

22          A. What's that?

23          Q. I'm not showing you the entire day.

24          Fair enough.

25               Let's just look in the clip, which is



1 what Ms. Salazar felt was the relevant clip of the  
2 incident that she took offense to. I'm just  
3 showing you what she took to the O'Reilly Factor.  
4 I don't have --

5 A. No, I --

6 Q. -- the entire --

7 A. -- I'm not familiar with it.

8 Is that what -- is that what that  
9 overall interview is about?

10 Q. That's what the book expert is about, so  
11 I show you that simply as an example if it would  
12 refresh your memory of any sort of encouragement or  
13 influencing or request or pervasive pattern or  
14 non-pervasive pattern of anyone in Trump world  
15 friendly to the campaign or friendly to Mr. Trump  
16 or friendly to Ms. Hicks portraying me in a false  
17 light publicly. That's the reason I showed it to  
18 you, to ask if that helps refresh your memory.

19 A. Not particularly -- no, it doesn't  
20 refresh any memory.

21 Q. Fair enough. I just had to ask since  
22 you mentioned Ms. Hicks.

23 And I would also like to put into the  
24 record the article you mentioned, since we did  
25 mention it, just to be extra organized. The



1 article about Ms. Hicks' screaming match with  
2 Mr. Lewandowski. So I'm just going to send that to  
3 the court reporter. That's a May 19th, 2016  
4 article.

5 MS. DELGADO: If we could just -- here,  
6 I just sent it to you. We could just insert  
7 that as an exhibit, even though the question --  
8 that was already referenced.

9 (Thereupon, Plaintiff's Exhibit No.  
10 11 was marked for identification.)

11 BY MS. DELGADO

12 Q. Okay. Did you have a chance to discuss  
13 with your counsel about Boris?

14 A. Yeah. And I can't really -- I'm subject  
15 to confidentiality, and so I'm not able to go any  
16 further.

17 Q. Okay. What's the confidentiality that  
18 you're subject to? I need to know the basis, as  
19 I'm sure Mr. Blumetti understands.

20 MR. BLUMETTI: You can answer, Reince.  
21 It's also privileged.

22 THE WITNESS: I think it's a privileged  
23 communication between me and White House  
24 counsel, and that's about it.

25 BY MS. DELGADO:



1 Q. I'm not requesting the communication  
2 between you and White House counsel, though. I'm  
3 requesting what were the circumstances under which  
4 Boris left. I don't want to know about your  
5 communication.

6 MR. BLUMETTI: Which was learned during  
7 the communications with counsel.

8 MS. DELGADO: I'm sorry. Can you say  
9 that again?

10 MR. BLUMETTI: Which was learned during  
11 the communications with counsel.

12 MS. DELGADO: So your position is that  
13 Mr. Priebus learned of the circumstances  
14 involving Boris via communications with counsel?

15 THE WITNESS: Yes.

16 BY MS. DELGADO:

17 Q. Sorry?

18 A. Yes.

19 MS. DELGADO: I don't see how that's  
20 privileged, the fact that that's how he learned  
21 of it. He's not seeking legal advice. It came  
22 up in the course of communications with counsel  
23 and does not make that itself attorney-client  
24 privilege. Unless Boris was thinking of suing  
25 him.





1 MR. BLUMETTI: That's a very narrow view  
2 of the attorney-client privilege. Mr. Priebus  
3 can't answer the question.

4 BY MS. DELGADO:

5 Q. Are you going to put forth some sort of  
6 Privilege Log or --

7 MR. BLUMETTI: I'm sorry. A Privilege  
8 Log? It was -- I understood it to be a verbal  
9 conversation.

10 MS. DELGADO: Because I can request --  
11 oh, it's --

12 BY MS. DELGADO:

13 Q. I thought you said it was an e-mail?

14 A. No, it was a -- it was an oral  
15 communication.

16 Q. So it came up in the context of a  
17 communication with White House counsel. Which  
18 White House counsel?

19 A. Mr. Karrol.

20 Q. Mr. who?

21 A. Karrol, K-A-R-R-O-L.

22 Q. K-A-R-R-O-L.

23 What's the first name?

24 A. Jim.

25 Q. Jim Karrol.



MS. DELGADO: I'll have to take that up with the judge because I don't see how -- unless Mr. Epshteyn was looking to file something against you or the circumstances -- I'm not asking for the communication itself. The fact that they came out in your -- in an e-mail or in a verbal communication does not in and of itself mean that the entire situation is confidential or subject to attorney-client privilege, and it's a matter of public -- especially with a public official in the White House.

So, okay, we can table that. I'll have to do a motion about that.

BY MS. DELGADO:

Q. And when was this communication?

A. I don't remember. Probably March 2017.

Q. And as a result of what emerged in that communication, Mr. Epshteyn was asked to leave the White House?

THE WITNESS: Jared, can I answer that?

MR. BLUMETTI: To the extent it's going to be put before the judge, we'll let you just -- we can raise it then.

MS. DELGADO: No. That's -- no, that's not privileged, and you really can't make a good



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

1 faith basis claim that that, too, is privileged.

2 MR. BLUMETTI: I'm sorry. Can you  
3 repeat the question?

4 MS. DELGADO: I'm sorry?

5 MR. BLUMETTI: Could you just -- you or  
6 the reporter, could you repeat the question?

7 MS. DELGADO: You said -- are you  
8 talking to the court reporter, you said "the  
9 reporter"?

10 THE STENOGRAPHER: He said "you or the  
11 reporter." I can read it back.

12 (Thereupon, the question read back as  
13 requested.)

14 MR. BLUMETTI: I think you can answer  
15 that, Reince.

16 THE WITNESS: Yes.

17 BY MS. DELGADO:

18 Q. Okay. Let's see.

19 Mr. Priebus, were you aware of any  
20 concerning background information on Mr. Miller's  
21 background, and I don't mean the SP 86 because he  
22 obviously didn't fill one out, but anything in  
23 Mr. Miller's background that you've heard of during  
24 that time or since then at any point?

25 A. During that time, no, but since then



1 there's been plenty in the public domain.

2 Q. Such as?

3 A. There was a lawsuit in Orlando. There's  
4 a -- that was publicly part of some kind of  
5 press -- some press stories, some kind of issues  
6 that were reported there. That's about it. Some,  
7 you know, personal issues that I've seen in the  
8 press.

9 Q. Anything you've heard privately that's  
10 not in the press?

11 A. No. I mean, other than just reiterating  
12 what's in the press.

13 Q. So I take it you've read about  
14 Mr. Miller's admission to the use of prostitutes  
15 and his visiting Asian-themed massaged parlors for  
16 sexual favors; does that ring a bell?

17 MR. BLUMETTI: Object to form.

18 THE WITNESS: Say that again.

19 BY MS. DELGADO:

20 Q. Have you read any reports about  
21 Mr. Miller's admission to use in hiring of  
22 prostitutes?

23 A. I don't know if I've read that he's  
24 admitted to that or that it's true or not, but I --  
25 I recall seeing allegations that sound similar to

1 those sorts of things.

2 Q. Have you read the reports of  
3 Mr. Miller's admission to visiting what you refer  
4 to as Asian-themed massage parlors in various  
5 cities for sexual favors?

6 MR. BLUMETTI: Objection to form.

7 THE WITNESS: I don't know about the  
8 favors part, but I've read or seen reports of  
9 those sorts of things involving him, but what's  
10 true and what's not, I don't know.

11 BY MS. DELGADO:

12 Q. Do you believe it was -- it would have  
13 been appropriate to hire Mr. Miller given his  
14 personal conduct failings?

15 MR. BLUMETTI: Objection to form.

16 THE WITNESS: Well, he wasn't.

17 BY MS. DELGADO:

18 Q. But he was at one point hired, correct?

19 A. Right. But you would have had to go  
20 through a background check.

21 Q. Let me ask you about one more person, a  
22 Sebastian Gorka. He was special assistant to the  
23 President; is that right?

24 A. I think that's right.

25 Q. And he left in August 2017; does that



1 ring a bell?

2 A. Rings a bell.

3 Q. And he also -- tell me if this rings a  
4 bell -- had only temporary security clearance,  
5 right?

6 A. I don't know.

7 Q. No.

8 Would it be correct to say or do you  
9 have any reason to believe this is inaccurate, that  
10 everyone from the comms group, just as you said,  
11 would happen allegedly on that plane ride with  
12 Mr. Miller, did go into the White House?

13 A. I don't know, because I don't know who  
14 everyone was in the comms group.

15 Q. I could spell out some names. Jessica  
16 Ditto, did she go in?

17 A. Yes.

18 Q. Steven Cheung?

19 A. Yes.

20 Q. Cliff Sims?

21 A. Yes.

22 Q. Haylan Dore (phonetic)?

23 A. I don't know.

24 Q. Kelly Love?

25 A. I don't know.



1 Q. Alexa Henning?

2 A. I believe so. I'm not a hundred  
3 percent, but I believe -- no, she did. I don't  
4 know if it was right away or later.

5 Q. Lindsay Walters?

6 A. Yes.

7 Q. Yes, to all of them.

8 A. But she was a RNC person, I believe.

9 Q. Yeah, you may be right. I think she  
10 joined -- yeah, transitioned at the end there. It  
11 was...

12 And there's Andrew also, but I forgot  
13 the last name, so I will not ask you about that.  
14 Let me see here. I think I'm just going through my  
15 notes before I let you go, if there's anything  
16 else.

17 Do you remember a Cassidy who worked for  
18 David Bossie in the campaign?

19 A. Yes.

20 Q. And do you remember, she did -- she was  
21 his administrative assistant who did our building  
22 security IDs? Does that ring a bell? Probably not  
23 since you weren't at the campaign.

24 A. No, I remember Cassidy working for Jared  
25 outside of Jared's office.



1 Q. Uh-hmm.

2 A. Maybe I'm not thinking of the right  
3 person. I think she worked for Jared.

4 Q. And what were the qualifications there?

5 A. I don't know. You'd have to ask Jared.

6 Q. There's one more article, and I can send  
7 it to you or we can speed things up and I can just  
8 tell you, it's a *New York Times* article from  
9 July 21st, 2017. And if I may quote from it, it's  
10 about Sean Spicer's resignation and it mentions  
11 you, so I wanted to ask you about that.

12 It says, "The resignation is a blow to  
13 the embattled White House Chief of Staff, Reince  
14 Priebus, the former RNC chairman who brought  
15 Mr. Spicer into the West Wing despite skepticism  
16 from Mr. Trump, who initially questioned his  
17 loyalty."

18 Do you remember that *New York Times*  
19 article?

20 A. No.

21 Q. Does that sound --

22 MR. BLUMETTI: Could you just give us --  
23 I'm sorry. I just wanted to know the name of  
24 the headline and the date again.

25 MS. DELGADO: Sure. Let me bring you





1 the -- let me just open it here. I won't send  
2 it, so it doesn't slow things down, but I'll  
3 just open the link. It is "Sean Spicer resigns  
4 as White House Press Secretary," and it's by  
5 Glenn Thrush and Maggie Haberman, and it's  
6 July 21st, 2017.

7 MR. BLUMETTI: Thank you.

8  
9 BY MS. DELGADO:

10 Q. Do you recall Mr. Trump expressing any  
11 concern about Mr. Spicer's loyalty?

12 A. No.

13 Q. Did you correct that article, or...

14 A. I didn't read it.

15 Q. You didn't read it.

16 So Mr. Trump never questioned  
17 Mr. Spicer's loyalty?

18 A. You'd have to ask him. I don't recall  
19 him questioning his loyalty.

20 What did the article say?

21 Q. I'll read it again. No problem.

22 "Mr. Spicer's resignation is a blow to  
23 the embattled White House Chief of Staff, Reince  
24 Priebus, the former RNC chairman who brought  
25 Mr. Spicer into the West Wing despite skepticism



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

1 from Mr. Trump who initially questioned his  
2 loyalty."

3 A. No. The President chose Sean among many  
4 people that wanted the job of press secretary.

5 Q. Why do you think those reporters -- do  
6 you have any idea why they would have had that  
7 belief enough to print it?

8 A. I don't know. Maybe someone said that  
9 to them. I don't know.

10 Q. Was Sean a big proponent of the  
11 President prior to the win?

12 A. I think Sean was very -- very much  
13 onboard with President Trump prior to the win and  
14 spent a lot of time in Trump Tower, working there  
15 once or twice a week while then coming back to the  
16 RNC a few days a week as well.

17 Q. Okay. And I just have one more article  
18 I want to reference here. Give me one minute. I'm  
19 almost done.

20 Okay. Earlier we were speaking about --  
21 you asked what the date of that mugshot was  
22 regarding Boris, that mugshot and the smoking gun,  
23 and it was March --

24 A. I don't think I asked about it, but you  
25 can tell me about.



1 Q. Oh, okay. Fair enough.

2 I think we went back and forth about the  
3 date on it, and it was March 2017. But I wanted to  
4 show you --

5 MS. DELGADO: And Mr. Blumetti, the  
6 article's title is "The obscure lawyer who  
7 became Donald Trump's TV attack guy," and it's  
8 *New York Times* October 13th, 2016.

9 BY MS. DELGADO:

10 Q. So this is pre-joining the White House,  
11 and this article does state, "Two years ago Mr.  
12 Epshteyn was charged with misdemeanor assault in  
13 Scottsdale, Arizona after a bar fight."

14 So this was in the public domain,  
15 Mr. Priebus, several weeks -- about two months  
16 before Mr. Epshteyn joined the White House.

17 Did you have any concern about that --

18 MR. BLUMETTI: Objection.

19 BY MS. DELGADO:

20 Q. -- the criminal record of someone  
21 serving as a special assistant to the President?

22 A. Sure, I do, but that's what the vetting  
23 is all about.

24 Q. Fair enough. Fair enough.

25 Okay. I think I'm pretty much done. I



1 mean, your counsel has an opportunity now to ask  
2 you any questions, but I think I have what I need.

3 MR. BLUMETTI: I don't have any  
4 questions.

5 MS. DELGADO: Okay. Give me 30 seconds  
6 to see here. I think we're -- I think that that  
7 will be it.

8 Did you want to opt to read?

9 MR. BLUMETTI: Yes.

10 MS. DELGADO: Okay. Then I guess that  
11 concludes. Mr. Priebus, thank you. I know this  
12 deposition was scheduled and rescheduled and  
13 rescheduled several times, so thank you for  
14 appearing and for answering my questions.

15 THE WITNESS: Thank you. No problem.

16 MS. DELGADO: Okay. Have a good  
17 afternoon.

18 THE WITNESS: All right. You too.

19 (Thereupon, the deposition was  
20 concluded at 2:05 p.m.)

21

22

23

24

25



CERTIFICATE OF OATH

STATE OF FLORIDA       )  
  )  
COUNTY OF MIAMI-DADE)

I, the undersigned authority, certify  
that REINCE PRIEBUS personally appeared before me  
and was duly sworn.

WITNESS my hand and official seal this  
February 21, 2024.

*Elena Robaina*

\_\_\_\_\_  
ELENA ROBAINA, FPR  
Notary Public-State of Florida



My Commission Expires: 4/17/2024  
My Commission #: GG971350



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705

## CERTIFICATE OF SHORTHAND REPORTER

STATE OF FLORIDA       )  
  ) SS.  
COUNTY OF MIAMI-DADE)

I, Elena Robaina, Florida Professional  
Shorthand Reporter, do hereby certify that I was  
authorized to and did stenographically report the  
deposition of REINCE PRIEBUS; and that the  
foregoing transcript, pages 1 through 161, is a  
true record of my stenographic notes.

I further certify that the said witness was  
duly sworn according to law.

I further certify that I am not of counsel  
to either of the parties to set cause or otherwise  
interested in the action.

In witness whereof, I here unto set my hand  
and affix my official seal this  
February 21, 2024.



\_\_\_\_\_  
Elena Robaina  
Florida Professional Reporter



JURAT PAGE

STATE OF FLORIDA     )  
  ) SS.  
COUNTY OF DADE     )

I, hereby certify that I have read the  
foregoing transcript pages 1 to 156 and find the  
same to be true and accurate.

Any corrections made by me are set forth  
on the errata page attached hereto.

-----  
REINCE PRIEBUS

Sworn to and subscribed before me on this,  
  
the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
Notary Public  
My Commission expires:  
My Commission #:



## ERRATA SHEET

I, REINCE PRIEBUS, do hereby acknowledge  
that I have read this transcript and find it to be  
accurate except for the corrections noted below.

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ / \_\_\_\_\_

\_\_\_\_\_  
REINCE PRIEBUS

Signed and dated this \_\_\_\_\_ day of 2024.



*Jeannie Reporting*  
Your Wish Is Our Job!

www.jeanniereporting.com  
305-577-1705





TO: REINCE PRIEBUS  
c/o Jared Blumetti, Esq.  
JBlumetti@LHRGB.com

February 21, 2024

IN RE: ARLENE DELGADO v. DONALD J. TRUMP FOR  
PRESIDENT, et al  
CASE NO: 19-cv-17764 (AT) (KHP)

Dear REINCE PRIEBUS,  
With reference to the examination of YOURSELF,  
deponent in the above-styled cause, taken on  
02/08/2024 under oath, please be advised that the  
transcript of the Deposition has been transcribed  
and is awaiting your signature.

Please arrange to conclude this matter at your  
earliest convenience. We would suggest that you or  
your attorney's office telephone this office and  
arrange an appointment suitable for all concerned.

However, if this has not been taken care of by  
March 22nd, 2024, we shall conclude the reading and  
signing of said deposition has been waived, and  
shall then proceed to file the original of the said  
transcript with the party who took the deposition,  
without further notice to any parties.

Sincerely,

ELENA ROBAINA, FPR

cc: All Counsel of Record.

<b>\$</b>	107:20, 109:6	<b>5</b>	158:12	10:22, 26:16, 29:14,
<b>\$500,000</b> [1] - 84:19	<b>2015-2016</b> [1] - 11:7	<b>5</b> [3] - 2:19, 106:4,	<b>accurate</b> [11] - 10:23,	33:25, 48:10, 53:7,
<b>,</b>	<b>2016</b> [11] - 2:17, 2:24,	106:5	11:17, 11:20, 20:4,	79:3, 102:14, 114:4,
<b>'20</b> [1] - 19:22	13:3, 31:14, 32:10,	<b>5-alarm</b> [2] - 67:8,	36:22, 85:15,	155:11
<b>0</b>	33:11, 39:15, 48:9,	74:24	116:24, 132:19,	<b>agree</b> [8] - 11:22,
<b>02/08/2024</b> [1] -	52:11, 143:3, 155:8	<b>50</b> [2] - 138:21, 139:1	132:21, 159:8, 160:5	12:6, 14:17, 15:7,
161:11	<b>2017</b> [23] - 7:18, 15:4,	<b>56</b> [1] - 2:17	<b>accurately</b> [1] - 38:11	17:22, 24:24, 29:24,
<b>1</b>	33:11, 33:12, 35:3,	<b>58</b> [1] - 3:2	<b>accusation</b> [2] - 23:3,	38:10
<b>1</b> [9] - 2:16, 42:20,	35:23, 48:9, 64:24,	<b>6</b>	126:2	<b>agreed</b> [2] - 21:16,
42:21, 46:14, 46:23,	65:3, 65:5, 65:6,	<b>6</b> [6] - 2:20, 77:21,	<b>acknowledge</b> [1] -	84:17
47:2, 96:22, 158:9,	68:24, 69:5, 98:5,	77:22, 78:5, 109:20,	160:3	<b>agreeing</b> [1] - 47:20
159:7	113:23, 117:23,	109:21	<b>acting</b> [1] - 4:3	<b>agreement</b> [2] - 82:9,
<b>10</b> [2] - 2:23, 134:15	125:9, 136:17,	<b>7</b>	<b>action</b> [1] - 158:15	82:12
<b>10005-1476</b> [1] - 2:6	146:16, 149:25,	<b>7</b> [2] - 2:21, 117:13	<b>activists</b> [3] - 12:11,	<b>Aguirre</b> [1] - 104:18
<b>106</b> [1] - 2:19	152:9, 153:6, 155:3	<b>7-8</b> [1] - 3:2	13:9, 13:23	<b>ahead</b> [6] - 34:4,
<b>109</b> [1] - 2:20	<b>2018</b> [9] - 2:21, 29:19,	<b>75</b> [1] - 115:8	<b>activities</b> [1] - 11:15	51:23, 64:8, 64:19,
<b>10:00</b> [1] - 1:14	97:14, 98:2, 98:4,	<b>8</b>	<b>actors</b> [1] - 90:13	95:11, 122:17
<b>10th</b> [1] - 113:23	98:5, 116:16,	<b>8</b> [4] - 1:13, 2:22,	<b>actual</b> [3] - 14:9,	<b>airplane</b> [1] - 136:3
<b>11</b> [2] - 2:24, 143:10	117:22, 120:9	119:6, 119:7	73:15, 73:18	<b>Airport</b> [1] - 79:3
<b>117</b> [1] - 2:21	<b>2019</b> [4] - 2:18, 64:22,	<b>86</b> [4] - 94:25, 100:3,	<b>adamant</b> [1] - 128:16	<b>AJ</b> [4] - 59:10, 92:12,
<b>119</b> [1] - 2:22	97:1, 98:5	129:5, 147:21	<b>address</b> [2] - 6:9, 53:2	135:20, 135:25
<b>11:30</b> [2] - 5:4, 58:19	<b>2020</b> [3] - 7:3, 7:9,	<b>8th</b> [1] - 39:15	<b>ADelgado@outlook.</b>	<b>AJ's</b> [1] - 51:6
<b>11:36</b> [1] - 63:1	7:13	<b>9</b>	<b>com</b> [1] - 2:4	<b>akin</b> [1] - 49:16
<b>11:45</b> [3] - 62:22, 63:2,	<b>2021</b> [1] - 7:9	<b>9</b> [3] - 2:23, 120:19,	<b>adjudicate</b> [1] -	<b>al</b> [2] - 1:7, 161:8
63:5	<b>2024</b> [7] - 1:13,	121:18	123:19	<b>alerts</b> [1] - 118:9
<b>12</b> [2] - 17:6, 117:16	157:11, 158:18,	<b>90</b> [1] - 5:3	<b>administered</b> [1] - 4:1	<b>Alexa</b> [1] - 151:1
<b>12/8/16</b> [1] - 2:17	159:19, 160:21,	<b>96</b> [1] - 2:18	<b>administration</b> [8] -	<b>Alexandria</b> [1] - 6:12
<b>120</b> [1] - 2:23	161:7, 161:16	<b>99</b> [2] - 112:6, 112:13	18:5, 72:13, 79:24,	<b>all-encompassing</b> [1]
<b>134</b> [1] - 2:23	<b>20th</b> [2] - 76:7, 94:10	<b>A</b>	108:16, 110:19,	- 66:10
<b>136</b> [1] - 2:3	<b>21</b> [3] - 157:11,	<b>a.m</b> [1] - 1:14	127:18, 131:19,	<b>allegation</b> [2] - 60:4,
<b>13th</b> [1] - 155:8	158:18, 161:7	<b>ability</b> [1] - 17:11	132:6	68:10
<b>143</b> [1] - 2:24	<b>21st</b> [2] - 152:9, 153:6	<b>able</b> [15] - 30:22, 31:5,	<b>administrations</b> [1] -	<b>allegations</b> [8] -
<b>15</b> [3] - 8:23, 8:24,	<b>22306</b> [1] - 6:13	35:6, 35:15, 43:15,	132:17	22:25, 65:7, 65:21,
116:16	<b>22nd</b> [7] - 31:22,	52:4, 81:13, 116:22,	<b>administrative</b> [2] -	66:2, 66:5, 128:5,
<b>156</b> [1] - 159:7	46:24, 47:3, 59:1,	126:5, 126:6,	25:23, 151:21	130:7, 148:25
<b>161</b> [1] - 158:9	68:6, 69:5, 161:16	126:15, 127:9,	<b>admission</b> [3] -	<b>allegedly</b> [4] - 114:5,
<b>17th</b> [1] - 113:22	<b>23</b> [2] - 52:17, 53:11	128:17, 134:3,	148:14, 148:21,	122:6, 123:20,
<b>19-cv-17764</b> [2] - 1:3,	<b>23rd</b> [4] - 2:17, 52:11,	143:15	149:3	150:11
161:9	56:25, 59:2	<b>above-styled</b> [1] -	<b>admitted</b> [1] - 148:24	<b>allow</b> [1] - 54:22
<b>1907</b> [1] - 6:12	<b>24th</b> [1] - 68:6	161:11	<b>advice</b> [2] - 54:24,	<b>allowed</b> [3] - 98:11,
<b>19th</b> [2] - 2:24, 143:3	<b>25</b> [1] - 97:16	<b>absolutely</b> [2] - 12:20,	144:21	125:14, 125:17
<b>1st</b> [1] - 35:3	<b>2:05</b> [2] - 1:14, 156:20	120:18	<b>advised</b> [1] - 161:11	<b>alluded</b> [1] - 121:22
<b>2</b>	<b>3</b>	<b>abuse</b> [3] - 117:25,	<b>advisor</b> [1] - 61:2	<b>almost</b> [3] - 83:5,
<b>2</b> [8] - 2:17, 36:2,	<b>3</b> [4] - 2:17, 56:20,	118:20, 126:1	<b>advisors</b> [2] - 80:9,	122:12, 154:19
42:14, 42:20, 42:23,	56:21, 56:22	<b>abusive</b> [2] - 119:3,	85:19	<b>aloud</b> [5] - 36:1,
42:25, 96:21, 97:8	<b>3/10/17</b> [1] - 2:20	128:6	<b>advocated</b> [4] - 26:4,	51:21, 51:25, 70:24,
<b>20</b> [1] - 31:13	<b>30</b> [2] - 39:7, 156:5	<b>accept</b> [1] - 90:10	26:7, 26:8, 79:25	97:12
<b>2000</b> [1] - 120:1	<b>32</b> [1] - 2:6	<b>Access</b> [3] - 87:14,	<b>advocating</b> [4] -	<b>altercation</b> [1] - 140:7
<b>2008</b> [1] - 12:2	<b>33</b> [1] - 2:3	91:10, 103:18	30:18, 79:17, 86:12,	<b>alumni</b> [5] - 84:3,
<b>2012</b> [1] - 12:2	<b>33135</b> [1] - 2:3	<b>according</b> [6] - 97:20,	91:16	84:5, 84:8, 84:9,
<b>2013</b> [1] - 109:5	<b>4</b>	103:17, 103:19,	<b>affair</b> [4] - 70:2, 77:19,	84:10
<b>2015</b> [6] - 31:22, 32:1,	<b>4</b> [5] - 2:13, 2:18,	103:21, 119:11,	78:1, 78:5	<b>ambassadors</b> [1] -
32:12, 32:19,	96:14, 96:17, 97:9	<b>ago</b> [12] - 6:23, 6:25,	<b>affected</b> [1] - 75:23	94:8
	<b>4/17/2024</b> [1] - 157:21		<b>affiliates</b> [1] - 6:21	<b>Ambrosini</b> [3] - 16:15,
	<b>40</b> [1] - 2:6		<b>affix</b> [1] - 158:17	20:11, 20:18
	<b>42</b> [2] - 2:16, 2:17		<b>afternoon</b> [1] - 156:17	<b>America</b> [1] - 23:20
	<b>43</b> [1] - 101:18		<b>afterwards</b> [1] - 135:4	<b>American</b> [1] - 44:23
			<b>agency</b> [2] - 18:5, 45:4	<b>amount</b> [1] - 25:1
			<b>aggravated</b> [1] - 99:19	<b>analysis</b> [2] - 55:13,
				59:6

<p><b>Andrew</b> [2] - 44:5, 151:12</p> <p><b>angle</b> [2] - 60:13</p> <p><b>announced</b> [4] - 46:15, 46:20, 46:24, 47:1</p> <p><b>announcement</b> [4] - 46:14, 46:24, 47:10, 47:11</p> <p><b>answer</b> [17] - 5:13, 5:15, 5:22, 66:23, 74:4, 82:5, 92:15, 95:11, 96:2, 109:2, 117:7, 125:11, 137:6, 143:20, 145:3, 146:20, 147:14</p> <p><b>answered</b> [4] - 28:23, 67:13, 73:2, 111:13</p> <p><b>answering</b> [6] - 34:10, 82:5, 82:7, 111:19, 111:21, 156:14</p> <p><b>answers</b> [4] - 4:22, 5:9, 34:11, 34:13</p> <p><b>Anthony</b> [1] - 98:14</p> <p><b>anti</b> [2] - 105:5, 105:14</p> <p><b>anti-female</b> [2] - 105:5, 105:14</p> <p><b>anyway</b> [1] - 4:20</p> <p><b>apart</b> [2] - 58:25, 79:11</p> <p><b>apologize</b> [2] - 52:3, 118:16</p> <p><b>appear</b> [1] - 140:12</p> <p><b>APPEARANCES</b> [1] - 2:1</p> <p><b>appeared</b> [1] - 157:8</p> <p><b>appearing</b> [1] - 156:14</p> <p><b>apples</b> [2] - 90:6</p> <p><b>applicants</b> [1] - 28:6</p> <p><b>application</b> [1] - 95:14</p> <p><b>applied</b> [2] - 86:16, 132:14</p> <p><b>appointed</b> [2] - 27:9, 51:7</p> <p><b>appointing</b> [4] - 46:9, 46:12, 47:11, 49:3</p> <p><b>appointment</b> [5] - 50:4, 50:14, 50:15, 161:15</p> <p><b>Apprentice</b> [1] - 27:15</p> <p><b>appropriate</b> [6] - 5:15, 5:21, 71:20, 101:4, 103:3, 149:13</p> <p><b>approximates</b> [1] - 38:1</p> <p><b>April</b> [2] - 2:18, 97:1</p> <p><b>area</b> [1] - 84:14</p> <p><b>arise</b> [1] - 74:17</p> <p><b>Arizona</b> [1] - 155:13</p>	<p><b>ARLENE</b> [3] - 1:4, 2:2, 161:8</p> <p><b>Arlene</b> [1] - 4:14</p> <p><b>arrange</b> [2] - 161:13, 161:15</p> <p><b>arrest</b> [4] - 110:4, 113:8, 113:19, 114:21</p> <p><b>arrested</b> [2] - 99:18, 114:3</p> <p><b>arrests</b> [1] - 107:18</p> <p><b>Article</b> [3] - 2:19, 2:20, 2:22</p> <p><b>article</b> [31] - 2:24, 29:19, 30:17, 30:20, 31:21, 77:21, 77:22, 77:24, 78:5, 78:6, 93:3, 105:12, 113:21, 113:22, 113:25, 116:14, 116:25, 118:5, 118:14, 118:15, 125:7, 142:24, 143:1, 143:4, 152:6, 152:8, 152:19, 153:13, 153:20, 154:17, 155:11</p> <p><b>article's</b> [1] - 155:6</p> <p><b>Asian</b> [2] - 148:15, 149:4</p> <p><b>Asian-themed</b> [2] - 148:15, 149:4</p> <p><b>aside</b> [2] - 47:20, 59:8</p> <p><b>assault</b> [3] - 110:6, 114:20, 155:12</p> <p><b>assistant</b> [8] - 16:14, 18:15, 20:18, 25:22, 149:22, 151:21, 155:21</p> <p><b>assists</b> [1] - 14:13</p> <p><b>assume</b> [6] - 5:10, 27:7, 28:5, 28:6, 108:11, 113:17</p> <p><b>assuming</b> [2] - 55:12, 57:3</p> <p><b>AT(KHP)</b> [2] - 1:3, 161:9</p> <p><b>attached</b> [2] - 135:9, 159:10</p> <p><b>attack</b> [1] - 155:7</p> <p><b>attempted</b> [1] - 52:6</p> <p><b>attended</b> [1] - 137:13</p> <p><b>attention</b> [11] - 34:10, 68:3, 68:10, 109:8, 114:7, 123:1, 123:7, 123:13, 125:10, 125:24, 129:23</p> <p><b>attorney</b> [16] - 5:19, 6:17, 29:21, 49:20, 58:10, 59:25, 62:14, 69:18, 69:20, 69:21, 81:16, 82:1, 82:2, 144:23, 145:2, 146:9</p> <p><b>attorney's</b> [1] - 161:14</p> <p><b>attorney-client</b> [6] - 58:10, 69:18, 69:20, 144:23, 145:2, 146:9</p> <p><b>attorneys</b> [1] - 50:6</p> <p><b>Audio</b> [1] - 1:12</p> <p><b>Audio-Video</b> [1] - 1:12</p> <p><b>August</b> [2] - 29:19, 149:25</p> <p><b>author</b> [1] - 55:25</p> <p><b>authority</b> [3] - 77:10, 132:2, 157:7</p> <p><b>authorized</b> [1] - 158:7</p> <p><b>automatically</b> [4] - 102:3, 102:10, 103:5, 103:6</p> <p><b>available</b> [1] - 40:20</p> <p><b>Avenue</b> [1] - 2:3</p> <p><b>average</b> [1] - 89:1</p> <p><b>avoided</b> [1] - 13:4</p> <p><b>awaiting</b> [1] - 161:12</p> <p><b>aware</b> [40] - 21:24, 22:24, 23:2, 23:3, 33:12, 33:22, 33:24, 50:25, 54:3, 55:25, 58:21, 60:23, 76:9, 76:10, 77:18, 78:1, 87:21, 88:6, 88:7, 99:11, 99:13, 99:17, 100:20, 101:10, 103:15, 109:3, 109:4, 113:8, 114:3, 117:2, 118:22, 119:1, 119:22, 119:23, 122:5, 126:20, 130:4, 130:5, 130:10, 147:19</p>	<p><b>badly</b> [1] - 123:20</p> <p><b>banking</b> [1] - 93:5</p> <p><b>Bannon</b> [7] - 15:25, 16:8, 17:1, 46:4, 47:18, 50:13, 88:15</p> <p><b>bar</b> [2] - 114:5, 155:13</p> <p><b>Barack</b> [1] - 11:25</p> <p><b>based</b> [5] - 27:8, 29:25, 107:23, 112:22, 129:10</p> <p><b>basic</b> [2] - 40:19, 70:3</p> <p><b>basis</b> [3] - 90:15, 143:18, 147:1</p> <p><b>Bates</b> [10] - 42:1, 42:3, 42:5, 42:7, 42:10, 51:17, 51:18, 51:25, 52:7, 52:22</p> <p><b>bathroom</b> [1] - 5:5</p> <p><b>Bay</b> [1] - 138:10</p> <p><b>Beach</b> [1] - 79:3</p> <p><b>bear</b> [2] - 39:6, 117:11</p> <p><b>beat</b> [1] - 123:20</p> <p><b>beating</b> [1] - 119:15</p> <p><b>became</b> [5] - 14:2, 74:24, 106:15, 139:18, 155:7</p> <p><b>become</b> [2] - 106:22, 118:22</p> <p><b>began</b> [2] - 97:14, 129:24</p> <p><b>beginning</b> [3] - 71:22, 72:1, 94:6</p> <p><b>begins</b> [1] - 53:19</p> <p><b>BEHALF</b> [2] - 2:2, 2:5</p> <p><b>behalf</b> [1] - 80:6</p> <p><b>behind</b> [3] - 19:19, 19:23, 48:24</p> <p><b>belief</b> [6] - 20:5, 41:9, 50:24, 75:2, 129:13, 154:7</p> <p><b>bell</b> [19] - 56:3, 83:7, 83:8, 84:24, 98:6, 105:3, 109:17, 114:8, 131:5, 131:9, 131:10, 131:15, 132:2, 132:3, 148:16, 150:1, 150:2, 150:4, 151:22</p> <p><b>below</b> [2] - 107:16, 160:5</p> <p><b>benefit</b> [1] - 83:17</p> <p><b>best</b> [7] - 22:23, 65:21, 66:3, 66:23, 84:23, 88:12, 109:16</p> <p><b>Best</b> [1] - 6:18</p> <p><b>better</b> [1] - 84:9</p> <p><b>between</b> [8] - 43:12, 57:2, 88:11, 135:20, 135:25, 140:19, 143:23, 144:2</p>	<p><b>Biden</b> [1] - 7:14</p> <p><b>Big</b> [1] - 15:3</p> <p><b>big</b> [11] - 13:22, 17:7, 17:13, 17:24, 18:7, 25:17, 25:21, 29:25, 81:2, 94:7, 154:10</p> <p><b>bigger</b> [1] - 21:11</p> <p><b>Bill</b> [1] - 17:6</p> <p><b>bit</b> [13] - 11:6, 32:21, 43:25, 44:2, 77:15, 79:7, 86:2, 94:18, 94:19, 104:18, 105:9, 131:16</p> <p><b>black</b> [1] - 2:22</p> <p><b>blackmail</b> [4] - 95:25, 116:21, 131:8, 131:15</p> <p><b>blanking</b> [1] - 44:24</p> <p><b>blew</b> [1] - 126:3</p> <p><b>blog</b> [6] - 23:2, 23:3, 23:6, 23:7, 23:10, 23:13</p> <p><b>blonde</b> [1] - 139:15</p> <p><b>blow</b> [2] - 152:12, 153:22</p> <p><b>Blumetti</b> [9] - 10:4, 31:19, 34:24, 35:2, 51:16, 133:25, 143:19, 155:5, 161:5</p> <p><b>blumetti</b> [1] - 6:1</p> <p><b>BLUMETTI</b> [103] - 2:7, 6:4, 7:19, 8:9, 8:16, 9:12, 12:14, 13:14, 15:18, 16:12, 17:23, 24:9, 25:3, 25:16, 27:11, 28:10, 30:2, 31:25, 35:6, 37:4, 37:20, 38:3, 38:8, 38:16, 41:10, 42:1, 42:6, 43:10, 51:20, 51:24, 52:8, 52:18, 52:21, 54:14, 54:19, 58:9, 60:1, 61:8, 62:1, 63:12, 63:25, 67:12, 68:7, 69:16, 71:6, 71:14, 72:4, 72:14, 73:1, 73:24, 74:25, 78:11, 78:21, 79:18, 80:19, 81:17, 81:21, 87:16, 89:7, 93:9, 93:23, 96:1, 100:9, 100:21, 101:6, 102:11, 103:8, 104:8, 105:16, 106:17, 108:17, 110:10, 116:11, 121:6, 123:14, 123:23, 124:12, 127:14, 128:25, 133:8,</p>
--	--	--	---



136:23, 137:16, 137:23, 138:1, 138:23, 140:8, 143:20, 144:6, 144:10, 145:1, 145:7, 146:21, 147:2, 147:5, 147:14, 148:17, 149:6, 149:15, 152:22, 153:7, 155:18, 156:3, 156:9 <b>Blumetti's</b> [1] - 10:7 <b>board</b> [3] - 7:7, 86:13, 101:22 <b>boasting</b> [1] - 124:9 <b>book</b> [13] - 15:1, 55:25, 84:25, 85:6, 109:16, 109:18, 131:4, 135:13, 137:22, 138:18, 138:25, 142:10 <b>Book</b> [1] - 2:23 <b>books</b> [2] - 131:2, 136:10 <b>Boris</b> [18] - 81:8, 82:19, 83:3, 84:13, 84:17, 110:1, 111:6, 113:11, 114:3, 127:7, 127:9, 133:15, 133:25, 143:13, 144:4, 144:14, 144:24, 154:22 <b>Boris'</b> [1] - 113:8 <b>boss</b> [1] - 135:22 <b>Bossie</b> [3] - 86:11, 135:15, 151:18 <b>bossie's</b> [1] - 137:22 <b>bounds</b> [1] - 64:6 <b>boxed</b> [1] - 89:25 <b>branch</b> [1] - 97:4 <b>break</b> [5] - 4:25, 5:3, 35:12, 62:17, 74:1 <b>breaks</b> [1] - 5:5 <b>Bremberg</b> [1] - 44:5 <b>briefed</b> [1] - 122:23 <b>bring</b> [6] - 18:23, 19:10, 37:17, 60:7, 118:13, 152:25 <b>bringing</b> [1] - 18:20 <b>brings</b> [4] - 19:12, 19:13, 44:20 <b>Broadcast</b> [1] - 84:18 <b>Broadcasting</b> [1] - 83:6 <b>broke</b> [2] - 120:7, 120:9 <b>brought</b> [18] - 19:14, 65:6, 68:2, 68:9, 74:9, 76:20, 91:5,	93:22, 109:8, 123:1, 123:6, 123:13, 125:9, 125:24, 129:22, 137:11, 152:14, 153:24 <b>build</b> [2] - 110:18, 111:16 <b>building</b> [4] - 12:5, 88:10, 110:22, 151:21 <b>bunch</b> [2] - 66:3, 93:1 <b>Bush</b> [3] - 84:9, 91:16, 101:18 <b>but..</b> [2] - 76:20, 120:3 <b>BY</b> [118] - 2:7, 2:13, 4:11, 6:7, 7:21, 8:11, 8:17, 9:15, 12:16, 13:18, 16:3, 16:19, 18:1, 24:18, 25:7, 25:19, 27:17, 28:11, 30:4, 30:15, 31:8, 31:12, 32:2, 35:20, 37:11, 37:24, 38:5, 38:12, 38:22, 39:10, 43:6, 43:14, 46:22, 52:14, 52:19, 53:1, 54:17, 55:1, 56:24, 58:17, 60:12, 61:15, 62:7, 63:7, 63:13, 64:2, 68:1, 68:15, 70:8, 71:9, 71:16, 72:11, 72:15, 73:5, 73:25, 75:25, 78:15, 78:24, 79:22, 80:23, 81:25, 87:18, 89:11, 93:19, 94:11, 96:6, 96:19, 100:10, 100:24, 101:9, 102:19, 103:12, 104:14, 105:21, 106:8, 106:20, 108:18, 109:24, 110:11, 116:13, 117:20, 119:10, 120:22, 121:20, 123:16, 123:25, 124:18, 127:16, 129:3, 133:11, 134:19, 135:11, 136:6, 136:25, 137:18, 138:3, 138:16, 139:4, 139:10, 139:14, 139:20, 140:3, 140:15, 141:3, 141:12, 143:11, 143:25, 144:16, 145:4, 145:12, 146:14, 147:17, 148:19, 149:11,	149:17, 153:9, 155:9, 155:19 <b>C</b> <b>c)</b> [4] [1] - 23:20 <b>c/o</b> [1] - 161:5 <b>cabinet</b> [8] - 19:20, 94:8, 106:16, 106:18, 110:18, 131:22, 131:23 <b>cabinets</b> [1] - 40:25 <b>calculation</b> [1] - 61:19 <b>California</b> [1] - 48:23 <b>campaign</b> [40] - 6:21, 10:5, 10:14, 10:19, 32:20, 58:23, 60:3, 60:4, 60:5, 66:2, 72:3, 72:6, 72:7, 79:6, 80:8, 81:6, 84:17, 85:20, 85:24, 85:25, 86:7, 86:9, 86:18, 87:8, 87:20, 87:24, 87:25, 88:11, 88:22, 89:2, 89:4, 90:2, 90:11, 90:17, 107:19, 131:13, 133:19, 142:15, 151:18, 151:23 <b>candidate</b> [3] - 22:2, 22:12, 135:22 <b>candidates</b> [5] - 13:8, 19:1, 24:25, 28:8, 111:5 <b>capacity</b> [1] - 4:3 <b>Caporale</b> [1] - 130:23 <b>care</b> [1] - 161:16 <b>cared</b> [1] - 118:1 <b>career</b> [3] - 27:6, 27:9, 85:14 <b>cares</b> [1] - 127:21 <b>Caroline</b> [1] - 131:13 <b>CASE</b> [2] - 1:3, 161:9 <b>case</b> [4] - 1:23, 35:25, 51:13, 116:20 <b>cases</b> [6] - 30:3, 30:5, 93:11, 94:1, 94:14, 116:24 <b>Cassidy</b> [2] - 151:17, 151:24 <b>Castro</b> [1] - 80:6 <b>category</b> [1] - 129:8 <b>cc</b> [1] - 161:24 <b>celebrity</b> [1] - 27:7 <b>certain</b> [3] - 16:5, 37:16, 91:2 <b>certainly</b> [16] - 14:22, 23:10, 49:16, 50:20, 56:11, 62:4, 62:10, 68:10, 72:7, 72:18, 75:18, 84:7, 88:3,	121:16, 125:2, 133:10 <b>CERTIFICATE</b> [2] - 157:1, 158:1 <b>certify</b> [6] - 58:16, 157:7, 158:6, 158:11, 158:13, 159:6 <b>CERTIFY</b> [1] - 3:1 <b>cetera</b> [1] - 25:22 <b>chair</b> [1] - 17:1 <b>chairman</b> [3] - 11:8, 152:14, 153:24 <b>chance</b> [5] - 102:18, 102:20, 102:21, 102:25, 143:12 <b>chances</b> [2] - 102:24, 103:2 <b>change</b> [2] - 121:3, 128:19 <b>changed</b> [2] - 102:14, 117:18 <b>charge</b> [9] - 10:11, 10:14, 11:9, 18:7, 19:25, 21:21, 37:22, 77:7, 112:18 <b>charged</b> [2] - 10:7, 155:12 <b>charges</b> [1] - 114:20 <b>chart</b> [22] - 36:9, 37:1, 37:6, 37:7, 37:9, 37:10, 37:15, 37:19, 38:2, 38:20, 39:23, 40:11, 40:15, 40:18, 51:7, 53:21, 54:3, 54:4, 54:11, 61:13, 74:9 <b>charts</b> [7] - 40:13, 40:16, 40:23, 40:24, 40:25, 41:1, 76:3 <b>chat</b> [4] - 30:12, 30:13, 30:16, 30:22 <b>chatter</b> [2] - 8:6, 8:21 <b>check</b> [8] - 62:23, 95:1, 99:22, 99:25, 100:2, 112:10, 112:22, 149:20 <b>checks</b> [8] - 95:4, 100:2, 100:6, 110:25, 117:6, 121:8, 121:24, 122:21 <b>Cheung</b> [1] - 150:18 <b>chief</b> [23] - 14:5, 14:10, 14:19, 14:23, 15:4, 15:5, 16:1, 16:7, 17:8, 17:9, 20:25, 21:12, 21:20, 21:22, 24:12, 28:21, 107:4, 108:20,	109:9, 118:3, 125:18, 129:24 <b>Chief</b> [2] - 152:13, 153:23 <b>children</b> [2] - 101:11, 102:9 <b>chimed</b> [1] - 26:14 <b>chiming</b> [1] - 28:16 <b>chose</b> [2] - 15:22, 154:3 <b>Chris</b> [4] - 15:1, 19:25, 20:1, 44:24 <b>Christie</b> [2] - 19:25, 20:1 <b>Christmas</b> [2] - 45:22, 45:25 <b>circle</b> [5] - 20:8, 23:16, 82:16, 113:24, 114:1 <b>circles</b> [1] - 127:6 <b>circumstances</b> [8] - 9:14, 9:16, 71:21, 72:8, 103:3, 144:3, 144:13, 146:4 <b>cities</b> [1] - 149:5 <b>claim</b> [3] - 103:15, 120:4, 147:1 <b>claimed</b> [1] - 119:2 <b>claims</b> [1] - 119:14 <b>clarified</b> [1] - 60:22 <b>clarify</b> [1] - 25:20 <b>clarifying</b> [1] - 65:9 <b>clean</b> [1] - 42:8 <b>clear</b> [9] - 5:10, 5:14, 10:10, 28:2, 33:18, 68:16, 88:10, 103:13, 104:3 <b>clearance</b> [25] - 94:19, 95:10, 98:10, 98:14, 98:25, 108:7, 108:12, 111:3, 115:14, 115:17, 116:9, 120:16, 122:11, 123:19, 125:15, 125:19, 126:10, 127:12, 128:18, 129:15, 129:23, 130:13, 130:15, 131:1, 150:4 <b>clearances</b> [8] - 99:3, 106:2, 125:21, 126:8, 126:16, 126:21, 128:13, 130:22 <b>cleared</b> [2] - 108:7, 108:8 <b>clearer</b> [1] - 80:17 <b>clearly</b> [1] - 10:6 <b>click</b> [1] - 31:5 <b>client</b> [7] - 58:10, 58:12, 69:18, 69:20,
--	--	--	--	--





<p>144:23, 145:2, 146:9  <b>cliff</b> [1] - 150:20  <b>Clinton</b> [1] - 12:1  <b>clip</b> [9] - 138:13, 138:15, 140:14, 140:20, 141:16, 141:17, 141:18, 141:25, 142:1  <b>clocks</b> [1] - 117:17  <b>close</b> [3] - 125:6, 128:11, 134:6  <b>club</b> [1] - 48:5  <b>clue</b> [1] - 125:12  <b>co</b> [7] - 10:2, 15:24, 16:7, 17:20, 36:16, 88:14, 111:2  <b>co-defendant</b> [3] - 10:2, 17:20, 111:2  <b>co-equal</b> [3] - 15:24, 16:7, 88:14  <b>co-leader</b> [1] - 36:16  <b>Cohn</b> [3] - 19:8, 19:12, 44:4  <b>coincidence</b> [1] - 79:2  <b>colbie</b> [1] - 119:13  <b>Colbie</b> [1] - 2:22  <b>college</b> [1] - 109:12  <b>coming</b> [7] - 18:3, 66:10, 75:12, 87:20, 112:8, 122:13, 154:15  <b>comm</b> [1] - 107:16  <b>comment</b> [1] - 78:19  <b>commented</b> [1] - 64:14  <b>Commission</b> [4] - 157:21, 157:21, 159:23, 159:24  <b>committed</b> [1] - 101:15  <b>committee</b> [4] - 8:1, 8:2, 11:10, 11:11  <b>Committee</b> [3] - 2:18, 11:9, 97:2  <b>comms</b> [16] - 18:14, 37:14, 39:21, 43:9, 45:17, 46:10, 46:12, 47:2, 47:19, 71:4, 71:11, 76:18, 100:15, 106:24, 150:10, 150:14  <b>communicated</b> [4] - 57:16, 58:22, 59:4, 88:9  <b>communicating</b> [2] - 67:17, 69:12  <b>Communication</b> [1] - 1:12  <b>communication</b> [15] - 57:21, 58:13, 63:21,</p>	<p>63:22, 67:3, 67:4, 143:23, 144:1, 144:5, 145:15, 145:17, 146:5, 146:7, 146:15, 146:18  <b>communications</b> [14] - 36:16, 44:15, 57:20, 60:6, 60:8, 68:21, 77:5, 104:12, 104:13, 127:11, 144:7, 144:11, 144:14, 144:22  <b>compared</b> [2] - 32:22, 33:1  <b>complaining</b> [1] - 74:16  <b>complaint</b> [3] - 65:4, 65:20, 68:5  <b>completed</b> [1] - 116:24  <b>completely</b> [1] - 57:15  <b>components</b> [1] - 97:19  <b>compound</b> [1] - 95:10  <b>compromised</b> [1] - 74:22  <b>concede</b> [4] - 13:15, 78:16, 87:4, 87:5  <b>conceding</b> [1] - 92:6  <b>concern</b> [3] - 120:14, 153:11, 155:17  <b>concerned</b> [1] - 161:15  <b>concerning</b> [2] - 97:23, 147:20  <b>concerns</b> [5] - 21:25, 22:7, 22:10, 53:24, 120:11  <b>conclude</b> [4] - 120:17, 121:9, 161:13, 161:16  <b>concluded</b> [1] - 156:20  <b>concludes</b> [1] - 156:11  <b>conclusion</b> [5] - 67:20, 69:25, 70:9, 70:11, 122:13  <b>conclusions</b> [2] - 72:19, 88:4  <b>conduct</b> [5] - 95:3, 97:23, 97:25, 114:21, 149:14  <b>conducting</b> [2] - 11:11, 117:6  <b>CONFERENCE</b> [1] - 2:1  <b>confidential</b> [1] - 146:8</p>	<p><b>confidentiality</b> [5] - 81:18, 82:9, 134:4, 143:15, 143:17  <b>confirmed</b> [1] - 70:1  <b>conflicts</b> [1] - 97:23  <b>confronting</b> [1] - 13:4  <b>Congress</b> [1] - 138:10  <b>Congressional</b> [2] - 2:18, 97:1  <b>connection</b> [1] - 93:13  <b>consider</b> [9] - 7:22, 23:6, 23:12, 32:12, 50:3, 85:2, 85:7, 100:12, 106:12  <b>considering</b> [1] - 8:7  <b>consistent</b> [1] - 41:8  <b>constant</b> [1] - 124:9  <b>contact</b> [1] - 14:15  <b>contentious</b> [4] - 11:21, 11:24, 12:5, 12:7  <b>context</b> [2] - 102:4, 145:16  <b>continued</b> [1] - 118:3  <b>contractors</b> [1] - 97:18  <b>convenience</b> [1] - 161:14  <b>Convention</b> [1] - 8:3  <b>conversation</b> [19] - 39:25, 41:12, 46:7, 47:4, 47:9, 65:10, 67:3, 69:19, 69:22, 70:4, 70:22, 72:23, 72:24, 73:8, 73:11, 73:22, 79:4, 145:9  <b>conversations</b> [8] - 47:7, 68:25, 69:3, 73:13, 75:20, 85:7, 86:21, 99:2  <b>conveyed</b> [1] - 56:1  <b>cooperative</b> [1] - 52:6  <b>cops</b> [1] - 118:2  <b>Corey</b> [4] - 77:19, 78:4, 78:9, 135:14  <b>corporate</b> [1] - 84:2  <b>correct</b> [53] - 7:1, 7:2, 7:3, 7:18, 8:3, 8:8, 21:2, 23:20, 23:21, 23:25, 24:8, 26:11, 38:7, 39:15, 49:20, 50:16, 51:11, 53:14, 53:22, 55:3, 82:20, 82:23, 83:1, 83:4, 84:24, 85:19, 88:18, 89:22, 90:3, 95:8, 102:5, 106:16, 107:4, 107:14, 108:5, 108:21, 109:17, 110:3,</p>	<p>115:20, 116:10, 120:18, 122:9, 123:4, 124:25, 126:8, 130:23, 135:1, 137:14, 141:13, 149:18, 150:8, 153:13  <b>corrections</b> [2] - 159:9, 160:5  <b>correctly</b> [6] - 21:17, 36:23, 66:13, 96:8, 121:22, 131:4  <b>Counsel</b> [1] - 161:24  <b>counsel</b> [21] - 18:21, 60:9, 99:1, 100:4, 110:25, 115:9, 115:12, 117:5, 122:15, 122:18, 143:13, 143:24, 144:2, 144:7, 144:11, 144:14, 144:22, 145:17, 145:18, 156:1, 158:13  <b>counsel's</b> [2] - 54:24, 126:12  <b>count</b> [1] - 61:19  <b>counterpart</b> [1] - 36:14  <b>counterparts</b> [1] - 84:16  <b>counties</b> [1] - 121:15  <b>country</b> [1] - 27:21  <b>COUNTY</b> [3] - 157:4, 158:3, 159:3  <b>couple</b> [8] - 21:6, 26:3, 36:13, 58:19, 93:15, 98:24, 114:4, 120:8  <b>course</b> [8] - 15:24, 21:7, 26:17, 28:18, 75:19, 99:5, 129:12, 144:22  <b>court</b> [12] - 5:16, 5:22, 39:4, 52:12, 96:11, 96:21, 97:7, 119:3, 135:12, 138:21, 143:3, 147:8  <b>cover</b> [2] - 10:19, 67:9  <b>covered</b> [2] - 11:1, 86:14  <b>credentials</b> [1] - 124:10  <b>criminal</b> [10] - 97:24, 108:14, 108:19, 110:13, 111:7, 111:8, 113:9, 114:13, 114:20, 155:20  <b>criticize</b> [1] - 87:23</p>	<p><b>crying</b> [1] - 78:7  <b>current</b> [2] - 6:15, 7:23</p> <p style="text-align: center;"><b>D</b></p> <p><b>D.C</b> [1] - 79:7  <b>DADE</b> [3] - 157:4, 158:3, 159:3  <b>daily</b> [1] - 101:11  <b>DATE</b> [1] - 1:13  <b>date</b> [11] - 14:8, 30:19, 31:21, 39:14, 52:16, 53:10, 113:21, 130:2, 152:24, 154:21, 155:3  <b>dated</b> [1] - 160:21  <b>daughter</b> [1] - 131:12  <b>Dave</b> [2] - 86:10, 135:15  <b>David</b> [1] - 151:18  <b>days</b> [5] - 14:9, 45:22, 45:25, 53:20, 154:16  <b>deal</b> [1] - 17:21  <b>dealing</b> [5] - 73:19, 74:6, 112:7, 122:11, 129:20  <b>Dear</b> [1] - 161:10  <b>Dearborn</b> [3] - 17:6, 17:12, 17:13  <b>debate</b> [1] - 11:12  <b>December</b> [15] - 2:17, 35:3, 39:15, 46:24, 47:3, 52:11, 52:17, 53:11, 56:25, 59:1, 59:2, 64:22, 67:16, 68:6, 69:5  <b>decided</b> [5] - 22:18, 22:23, 50:17, 92:9, 105:18  <b>deciding</b> [1] - 18:7  <b>decision</b> [17] - 14:14, 15:21, 19:2, 19:11, 19:17, 21:4, 25:11, 36:10, 36:18, 36:20, 37:2, 50:19, 50:23, 54:23, 75:21, 77:9, 93:20  <b>decision-making</b> [3] - 14:14, 19:17, 77:9  <b>decisions</b> [11] - 11:3, 11:4, 16:18, 16:20, 16:21, 16:23, 17:22, 17:25, 93:8, 96:3, 111:14  <b>declare</b> [1] - 21:15  <b>defend</b> [1] - 80:11  <b>defendant</b> [3] - 10:2, 17:20, 111:2  <b>DEFENDANT</b> [1] - 2:5  <b>Defendants</b> [1] - 1:9</p>
---	--	--	--	---



<p><b>defended</b> [2] - 81:1, 81:2</p> <p><b>defending</b> [2] - 79:16, 79:20</p> <p><b>Defense</b> [1] - 2:25</p> <p><b>defensive</b> [1] - 80:15</p> <p><b>define</b> [1] - 100:18</p> <p><b>defining</b> [1] - 125:2</p> <p><b>definitely</b> [4] - 5:2, 79:19, 79:25, 140:4</p> <p><b>degree</b> [4] - 61:2, 109:12, 124:5, 124:9</p> <p><b>DELGADO</b> [174] - 1:4, 2:2, 2:13, 4:11, 6:1, 6:6, 6:7, 7:21, 8:11, 8:17, 9:15, 12:16, 13:18, 16:3, 16:19, 18:1, 24:18, 25:7, 25:19, 27:17, 28:11, 30:4, 30:15, 31:8, 31:12, 31:19, 32:2, 35:1, 35:8, 35:14, 35:18, 35:20, 37:11, 37:24, 38:5, 38:12, 38:22, 39:10, 42:3, 42:9, 42:15, 42:18, 42:25, 43:4, 43:6, 43:14, 46:21, 46:22, 51:16, 51:23, 52:3, 52:10, 52:14, 52:19, 52:25, 53:1, 54:17, 55:1, 56:18, 56:24, 58:15, 58:17, 60:12, 61:15, 62:7, 62:16, 62:19, 62:25, 63:4, 63:7, 63:13, 64:2, 68:1, 68:15, 69:19, 70:8, 71:9, 71:16, 72:11, 72:15, 73:5, 73:25, 75:25, 78:15, 78:24, 79:22, 80:23, 81:23, 81:25, 87:18, 89:11, 93:19, 94:11, 96:6, 96:14, 96:19, 100:10, 100:24, 101:9, 102:19, 103:12, 104:14, 105:21, 106:4, 106:8, 106:20, 108:18, 109:24, 110:11, 116:13, 117:15, 117:20, 119:10, 120:22, 121:18, 121:20, 123:16, 123:25, 124:13, 124:18, 127:16, 129:3, 133:11, 134:18, 134:19, 135:11, 136:4, 136:6,</p>	<p>136:25, 137:18, 137:24, 138:2, 138:3, 138:14, 138:16, 138:20, 138:24, 139:4, 139:10, 139:14, 139:20, 140:3, 140:10, 140:15, 141:3, 141:12, 143:5, 143:11, 143:25, 144:8, 144:12, 144:16, 144:19, 145:4, 145:10, 145:12, 146:1, 146:14, 146:24, 147:4, 147:7, 147:17, 148:19, 149:11, 149:17, 152:25, 153:9, 155:5, 155:9, 155:19, 156:5, 156:10, 156:16, 161:8</p> <p><b>Delgado</b> [1] - 4:14</p> <p><b>deliberate</b> [1] - 34:17</p> <p><b>demand</b> [1] - 86:21</p> <p><b>denials</b> [1] - 97:15</p> <p><b>departed</b> [2] - 29:20, 116:15</p> <p><b>department</b> [26] - 19:7, 25:25, 26:1, 26:9, 26:14, 28:18, 37:16, 37:22, 40:20, 41:19, 41:21, 41:23, 41:25, 43:17, 50:19, 54:23, 55:2, 55:5, 56:13, 60:8, 93:25, 94:2, 94:7, 104:11, 110:22, 131:21</p> <p><b>departments</b> [12] - 15:22, 18:7, 18:8, 18:11, 40:17, 40:21, 41:1, 43:19, 43:20, 44:8, 45:6, 94:1</p> <p><b>departure</b> [1] - 7:18</p> <p><b>depended</b> [1] - 95:14</p> <p><b>deplorable</b> [2] - 91:7, 103:17</p> <p><b>deponent</b> [1] - 161:11</p> <p><b>deposed</b> [1] - 4:17</p> <p><b>DEPOSITION</b> [1] - 1:18</p> <p><b>deposition</b> [14] - 4:17, 10:2, 34:20, 35:3, 35:23, 37:9, 38:11, 81:24, 92:20, 156:12, 156:19, 158:8, 161:17, 161:18</p> <p><b>Deposition</b> [3] - 1:23,</p>	<p>2:16, 161:12</p> <p><b>depositions</b> [1] - 134:22</p> <p><b>deputy</b> [8] - 21:12, 25:22, 90:23, 100:8, 100:16, 107:7, 109:4, 109:13</p> <p><b>describe</b> [8] - 11:19, 11:20, 14:10, 14:16, 17:17, 18:18, 48:3, 136:16</p> <p><b>described</b> [3] - 50:11, 138:17, 138:25</p> <p><b>describing</b> [3] - 37:18, 48:4, 137:13</p> <p><b>despite</b> [5] - 103:14, 116:19, 128:5, 152:15, 153:25</p> <p><b>detail</b> [3] - 66:22, 94:24, 134:3</p> <p><b>detailed</b> [3] - 95:1, 126:13, 126:18</p> <p><b>details</b> [3] - 41:2, 67:25, 128:21</p> <p><b>determination</b> [3] - 101:24, 115:19, 115:21</p> <p><b>determined</b> [4] - 10:19, 10:20, 10:25, 50:7</p> <p><b>devices</b> [1] - 23:17</p> <p><b>died</b> [1] - 80:6</p> <p><b>differences</b> [1] - 128:20</p> <p><b>different</b> [19] - 28:8, 32:15, 32:21, 32:23, 40:25, 41:1, 44:2, 44:6, 44:7, 45:6, 45:7, 84:12, 89:17, 97:19, 102:16, 122:24, 128:23, 129:6</p> <p><b>difficultly</b> [1] - 130:14</p> <p><b>difficult</b> [1] - 42:11</p> <p><b>difficulties</b> [1] - 35:12</p> <p><b>diligence</b> [1] - 101:2</p> <p><b>DIRECT</b> [2] - 2:12, 4:10</p> <p><b>directive</b> [1] - 70:16</p> <p><b>directly</b> [1] - 139:24</p> <p><b>director</b> [13] - 17:18, 21:18, 21:23, 37:14, 46:10, 46:13, 47:2, 47:20, 71:4, 71:11, 90:22, 100:16, 106:24</p> <p><b>disagree</b> [1] - 115:17</p> <p><b>disclosing</b> [2] - 66:24, 85:6</p> <p><b>disclosure</b> [1] - 69:17</p>	<p><b>disclosures</b> [1] - 98:21</p> <p><b>discrimination</b> [1] - 59:24</p> <p><b>discuss</b> [1] - 143:12</p> <p><b>discussed</b> [10] - 36:19, 49:2, 67:5, 68:13, 72:25, 74:5, 74:8, 92:8, 94:3, 99:1</p> <p><b>discussing</b> [5] - 29:20, 35:24, 53:14, 63:9, 70:22</p> <p><b>discussion</b> [7] - 31:7, 51:5, 55:13, 74:21, 74:23, 135:25, 138:7</p> <p><b>discussions</b> [7] - 3:4, 8:13, 8:19, 21:24, 22:6, 40:12, 58:7</p> <p><b>disliked</b> [2] - 133:13, 133:16</p> <p><b>disorderly</b> [1] - 114:21</p> <p><b>disqualify</b> [1] - 103:6</p> <p><b>disqualifying</b> [7] - 97:22, 101:21, 102:3, 102:10, 107:24, 108:16, 111:4</p> <p><b>disrespectful</b> [1] - 34:12</p> <p><b>dissect</b> [1] - 66:21</p> <p><b>distinct</b> [1] - 102:21</p> <p><b>distinguishing</b> [1] - 128:21</p> <p><b>DISTRICT</b> [2] - 1:1, 1:1</p> <p><b>Ditto</b> [1] - 150:16</p> <p><b>division</b> [1] - 88:10</p> <p><b>Dobbs</b> [1] - 14:1</p> <p><b>document</b> [7] - 51:22, 52:2, 52:9, 65:18, 72:22, 73:23, 96:25</p> <p><b>documents</b> [1] - 73:14</p> <p><b>dog</b> [2] - 105:4, 105:14</p> <p><b>DOJ</b> [14] - 95:2, 100:3, 101:23, 107:21, 109:1, 111:24, 112:1, 113:4, 115:9, 115:20, 117:4, 121:13, 122:20, 126:11</p> <p><b>domain</b> [3] - 136:22, 148:1, 155:14</p> <p><b>domestic</b> [6] - 117:25, 118:20, 121:14, 122:4, 126:1, 127:21</p> <p><b>Don</b> [22] - 18:18, 19:3, 48:16, 48:18, 48:21, 49:18, 49:19, 50:2, 54:7, 54:8, 65:16,</p>	<p>66:7, 94:22, 99:2, 112:7, 112:17, 123:6, 125:9, 129:22, 130:1, 130:8, 130:9</p> <p><b>Donald</b> [12] - 6:20, 9:11, 12:24, 13:4, 13:17, 30:7, 31:14, 63:8, 63:16, 65:24, 89:3, 155:7</p> <p><b>DONALD</b> [2] - 1:7, 161:8</p> <p><b>done</b> [12] - 10:10, 11:4, 21:15, 56:19, 61:3, 95:2, 125:6, 125:23, 128:12, 134:6, 154:19, 155:25</p> <p><b>door</b> [1] - 130:22</p> <p><b>Dore</b> [1] - 150:22</p> <p><b>doubt</b> [1] - 125:25</p> <p><b>down</b> [16] - 20:9, 34:9, 36:12, 39:23, 41:5, 41:14, 56:16, 56:18, 112:3, 112:25, 113:5, 114:19, 125:6, 132:18, 134:24, 153:2</p> <p><b>DPC</b> [2] - 19:13, 44:5</p> <p><b>draft</b> [3] - 36:9, 65:4, 65:20</p> <p><b>dress</b> [1] - 139:16</p> <p><b>Drieband</b> [5] - 3:5, 54:9, 58:8, 58:21, 62:13</p> <p><b>drive</b> [1] - 101:12</p> <p><b>Drive</b> [1] - 6:12</p> <p><b>Drudge</b> [1] - 67:9</p> <p><b>drug</b> [2] - 97:24, 131:13</p> <p><b>dual</b> [1] - 23:17</p> <p><b>due</b> [3] - 22:25, 101:2, 128:18</p> <p><b>dug</b> [1] - 103:19</p> <p><b>DUI</b> [7] - 101:5, 101:16, 102:14, 103:4, 103:14, 109:5, 109:6</p> <p><b>DUIs</b> [2] - 108:14, 111:8</p> <p><b>duly</b> [3] - 4:7, 157:9, 158:12</p> <p><b>during</b> [24] - 13:24, 16:25, 17:14, 21:18, 22:2, 22:8, 22:13, 32:19, 40:23, 68:22, 68:25, 69:3, 87:13, 91:8, 92:20, 104:17, 105:5, 107:19, 123:2, 135:3, 144:6,</p>
---	--	---	--	---



144:10, 147:23, 147:25 <b>duties</b> [3] - 14:19, 15:8, 20:2 <b>DWI</b> [2] - 99:19, 101:5	<b>emerged</b> [1] - 146:17 <b>employed</b> [2] - 74:8, 77:4 <b>employee</b> [6] - 58:13, 64:15, 89:9, 89:12, 97:4, 112:20 <b>employees</b> [8] - 41:21, 88:21, 88:22, 88:23, 89:2, 89:6, 89:9, 97:15 <b>employment</b> [19] - 6:16, 58:22, 62:13, 63:10, 63:17, 63:24, 64:1, 72:25, 73:9, 73:15, 73:18, 73:19, 73:20, 74:5, 76:25, 92:22, 103:7 <b>encompassing</b> [1] - 66:10 <b>encouraged</b> [2] - 136:10, 137:5 <b>encouragement</b> [1] - 142:12 <b>end</b> [14] - 12:1, 13:5, 36:8, 36:21, 56:10, 67:16, 71:22, 72:1, 82:17, 85:10, 85:11, 95:19, 132:15, 151:10 <b>ended</b> [2] - 36:16, 98:15 <b>endorse</b> [1] - 32:18 <b>endorsed</b> [1] - 32:7 <b>endorsement</b> [1] - 9:10 <b>engage</b> [1] - 140:6 <b>engagement</b> [1] - 58:5 <b>ensued</b> [1] - 135:25 <b>ensuring</b> [1] - 53:25 <b>entire</b> [4] - 141:21, 141:23, 142:6, 146:8 <b>entitled</b> [1] - 31:13 <b>Epshteyn</b> [6] - 81:8, 111:7, 146:3, 146:18, 155:12, 155:16 <b>equal</b> [3] - 15:24, 16:7, 88:14 <b>equate</b> [1] - 102:20 <b>Eric</b> [2] - 54:9, 131:18 <b>errata</b> [1] - 159:10 <b>ERRATA</b> [1] - 160:1 <b>especially</b> [5] - 13:20, 74:18, 87:14, 89:3, 146:10 <b>Esq</b> [1] - 161:5 <b>ESQ</b> [1] - 2:7 <b>established</b> [1] - 45:1 <b>et</b> [3] - 1:7, 25:22, 161:8	<b>evening</b> [2] - 57:2, 57:6 <b>evenings</b> [2] - 57:7, 57:9 <b>event</b> [4] - 42:12, 135:19, 137:13, 138:10 <b>events</b> [2] - 20:17, 27:15 <b>eventually</b> [2] - 88:9, 97:16 <b>ex</b> [4] - 119:2, 119:12, 119:23, 122:6 <b>ex-wife</b> [1] - 122:6 <b>ex-wives</b> [3] - 119:2, 119:12, 119:23 <b>exact</b> [2] - 104:10, 138:17 <b>exactly</b> [5] - 47:14, 47:25, 55:21, 124:17, 131:25 <b>EXAMINATION</b> [1] - 4:10 <b>examination</b> [1] - 161:10 <b>examined</b> [1] - 4:8 <b>example</b> [9] - 18:17, 18:20, 83:14, 90:9, 90:18, 126:6, 127:7, 137:10, 142:11 <b>examples</b> [1] - 83:19 <b>except</b> [1] - 160:5 <b>exceptions</b> [1] - 84:6 <b>excerpt</b> [6] - 34:23, 136:7, 137:17, 137:21, 138:4, 138:25 <b>excerpts</b> [1] - 136:9 <b>excuse</b> [2] - 34:17, 68:19 <b>executive</b> [3] - 17:17, 97:4, 97:19 <b>Exhibit</b> [18] - 42:14, 42:21, 42:23, 56:20, 56:22, 96:14, 96:17, 106:4, 106:5, 109:20, 109:21, 117:13, 119:6, 119:7, 120:19, 121:18, 134:14, 143:9 <b>exhibit</b> [12] - 23:15, 39:2, 42:2, 56:19, 114:19, 117:11, 119:5, 120:25, 133:22, 134:5, 143:7 <b>Exhibits</b> [1] - 2:25 <b>exhibits</b> [3] - 42:7, 114:1, 117:16 <b>EXHIBITS</b> [1] - 2:14	<b>existed</b> [1] - 36:9 <b>existence</b> [1] - 73:23 <b>existing</b> [1] - 73:14 <b>experience</b> [2] - 56:6, 124:8 <b>expert</b> [4] - 117:7, 117:9, 130:19, 142:10 <b>Expires</b> [1] - 157:21 <b>expires</b> [1] - 159:23 <b>explain</b> [5] - 92:11, 96:23, 105:13, 126:15, 126:18 <b>explained</b> [2] - 97:10, 97:13 <b>explaining</b> [2] - 100:17, 140:24 <b>exploded</b> [2] - 118:24, 130:11 <b>expressing</b> [1] - 153:10 <b>extent</b> [10] - 27:16, 51:21, 52:1, 57:20, 58:1, 58:10, 69:17, 75:22, 77:5, 146:21 <b>extra</b> [1] - 142:25 <b>extract</b> [2] - 52:4, 52:7 <b>extraction</b> [1] - 42:9 <b>extramarital</b> [1] - 77:19 <b>extreme</b> [1] - 116:21 <b>eye</b> [1] - 2:22	19:23 <b>faith</b> [1] - 147:1 <b>fall</b> [2] - 32:19, 44:11 <b>false</b> [3] - 136:11, 136:12, 142:16 <b>familiar</b> [5] - 15:2, 79:12, 79:13, 96:7, 142:7 <b>family</b> [4] - 6:21, 61:4, 132:19, 133:5 <b>far</b> [8] - 32:23, 41:2, 41:17, 64:14, 70:16, 84:9, 117:7, 133:18 <b>fast</b> [1] - 138:21 <b>fast-forward</b> [1] - 138:21 <b>father</b> [1] - 49:14 <b>faulting</b> [1] - 89:23 <b>favor</b> [2] - 30:7, 89:13 <b>favorable</b> [1] - 136:8 <b>favours</b> [3] - 148:16, 149:5, 149:8 <b>FBI</b> [24] - 95:3, 95:22, 100:3, 100:25, 101:1, 101:23, 107:22, 108:25, 111:24, 112:2, 113:4, 115:9, 115:13, 115:19, 117:4, 118:2, 119:24, 120:2, 120:13, 121:13, 122:5, 122:20, 126:11, 131:14 <b>February</b> [7] - 1:13, 32:10, 117:22, 120:9, 157:11, 158:18, 161:7 <b>federal</b> [1] - 97:4 <b>fell</b> [1] - 36:21 <b>fellow</b> [2] - 13:7, 34:22 <b>fellows</b> [1] - 7:6 <b>fellowship</b> [1] - 7:4 <b>felt</b> [6] - 22:21, 29:23, 59:22, 86:12, 86:13, 142:1 <b>female</b> [2] - 105:5, 105:14 <b>Ferre</b> [3] - 104:19, 104:24 <b>few</b> [15] - 35:24, 45:5, 45:15, 45:21, 45:25, 46:14, 46:23, 53:20, 87:23, 99:18, 103:5, 103:14, 127:2, 127:3, 154:16 <b>Fidel</b> [1] - 80:6 <b>field</b> [1] - 11:13 <b>fight</b> [1] - 155:13 <b>figure</b> [5] - 19:9,
<b>E</b>				
<b>E-mail</b> [3] - 2:4, 2:7, 2:17 <b>e-mail</b> [22] - 2:17, 39:1, 39:2, 39:4, 39:12, 41:4, 41:13, 41:17, 43:8, 51:10, 52:11, 52:15, 52:23, 53:2, 54:5, 57:2, 57:13, 59:2, 96:11, 134:17, 145:13, 146:6 <b>e-mails</b> [2] - 62:23, 93:18 <b>eager</b> [1] - 139:24 <b>ear</b> [1] - 26:2 <b>earliest</b> [1] - 161:14 <b>early</b> [8] - 30:9, 31:24, 32:12, 33:1, 68:23, 69:5, 122:5, 125:9 <b>ease</b> [1] - 5:22 <b>easier</b> [1] - 30:11 <b>easy</b> [3] - 18:13, 18:18, 32:9 <b>economics</b> [1] - 44:4 <b>ecstatic</b> [1] - 83:24 <b>education</b> [1] - 104:5 <b>effect</b> [1] - 4:2 <b>effective</b> [2] - 22:21, 22:22 <b>effort</b> [1] - 11:14 <b>eight</b> [3] - 26:16, 29:13, 33:25 <b>either</b> [10] - 18:2, 28:14, 65:12, 65:19, 70:7, 91:22, 108:11, 112:2, 115:14, 158:14 <b>elected</b> [2] - 32:17, 101:19 <b>election</b> [4] - 11:7, 14:9, 33:9, 91:8 <b>elections</b> [2] - 21:19, 87:14 <b>ELENA</b> [2] - 157:16, 161:21 <b>Elena</b> [3] - 1:20, 158:5, 158:21 <b>embarrassing</b> [5] - 72:2, 72:12, 91:15, 103:20, 111:8 <b>embattled</b> [2] - 152:13, 153:23				
<b>F</b>				
			<b>f-e-r-r-e</b> [1] - 105:1 <b>facet</b> [1] - 89:24 <b>facilitated</b> [1] - 24:7 <b>facing</b> [2] - 27:2, 29:8 <b>fact</b> [9] - 24:7, 48:4, 70:2, 87:8, 87:9, 107:13, 126:1, 144:20, 146:5 <b>Factor</b> [1] - 142:3 <b>factors</b> [1] - 61:10 <b>facts</b> [1] - 70:14 <b>fail</b> [1] - 127:11 <b>failings</b> [1] - 149:14 <b>fair</b> [29] - 9:25, 13:19, 29:15, 34:8, 76:21, 80:4, 83:11, 84:11, 87:15, 87:17, 89:1, 91:18, 92:4, 95:20, 112:11, 117:10, 120:18, 122:2, 122:25, 124:10, 129:18, 141:19, 141:24, 142:21, 155:1, 155:24 <b>fairly</b> [3] - 16:8, 19:19,	



<p>35:11, 47:7, 65:1, 85:22</p> <p><b>file</b> [2] - 146:3, 161:17</p> <p><b>filed</b> [5] - 1:23, 10:24, 64:4, 64:22, 65:3</p> <p><b>files</b> [1] - 121:14</p> <p><b>fill</b> [7] - 19:4, 29:2, 29:3, 94:25, 115:6, 129:1, 147:22</p> <p><b>filled</b> [2] - 19:18, 29:2</p> <p><b>filters</b> [1] - 139:25</p> <p><b>final</b> [5] - 39:22, 43:7, 43:8, 43:9, 43:16</p> <p><b>financial</b> [2] - 97:24, 98:21</p> <p><b>financially</b> [3] - 85:4, 85:5, 85:8</p> <p><b>fine</b> [3] - 29:15, 85:8, 125:12</p> <p><b>fire</b> [2] - 67:8, 74:24</p> <p><b>firm</b> [2] - 6:17, 6:19</p> <p><b>First</b> [2] - 23:20, 106:14</p> <p><b>first</b> [16] - 4:7, 30:9, 46:1, 59:13, 68:22, 69:4, 82:15, 115:4, 119:14, 125:16, 126:2, 127:20, 134:20, 139:19, 145:23</p> <p><b>five</b> [3] - 10:21, 62:20, 79:5</p> <p><b>FI</b> [1] - 2:3</p> <p><b>FL</b> [1] - 2:6</p> <p><b>flag</b> [1] - 74:17</p> <p><b>flash</b> [1] - 29:17</p> <p><b>flip</b> [1] - 96:21</p> <p><b>florida</b> [1] - 158:22</p> <p><b>FLORIDA</b> [3] - 157:3, 158:2, 159:2</p> <p><b>Florida</b> [7] - 1:20, 1:22, 4:3, 4:3, 124:22, 157:16, 158:5</p> <p><b>flow</b> [1] - 14:14</p> <p><b>flux</b> [1] - 43:25</p> <p><b>focus</b> [3] - 19:20, 27:22, 84:14</p> <p><b>focused</b> [1] - 18:4</p> <p><b>folks</b> [15] - 18:24, 26:1, 36:14, 83:22, 84:1, 86:16, 87:7, 87:10, 87:25, 93:18, 101:24, 110:19, 115:20, 117:5, 122:18</p> <p><b>follow</b> [2] - 36:1, 140:5</p> <p><b>following</b> [2] - 57:2, 57:6</p> <p><b>follows</b> [1] - 4:8</p>	<p><b>footage</b> [2] - 91:15, 103:20</p> <p><b>FOR</b> [3] - 1:7, 2:14, 161:8</p> <p><b>force</b> [1] - 4:2</p> <p><b>forefront</b> [2] - 12:10, 13:1</p> <p><b>foregoing</b> [2] - 158:9, 159:7</p> <p><b>foreign</b> [1] - 97:22</p> <p><b>forgot</b> [1] - 151:12</p> <p><b>form</b> [70] - 7:19, 8:9, 8:16, 9:12, 12:14, 13:14, 15:18, 16:12, 17:23, 24:9, 25:3, 25:16, 27:11, 30:2, 31:25, 37:4, 37:20, 38:3, 38:8, 38:16, 41:10, 43:10, 54:14, 54:19, 60:1, 60:25, 61:8, 62:1, 63:12, 63:25, 67:12, 68:7, 69:16, 71:6, 71:14, 72:4, 72:14, 73:1, 73:24, 74:25, 78:11, 79:18, 80:19, 87:16, 89:7, 93:9, 93:23, 94:25, 96:1, 100:9, 100:21, 101:6, 102:11, 103:8, 104:8, 105:16, 106:17, 108:17, 110:10, 116:11, 121:6, 123:23, 124:12, 127:14, 128:25, 133:8, 136:23, 148:17, 149:6, 149:15</p> <p><b>former</b> [3] - 135:14, 152:14, 153:24</p> <p><b>forth</b> [4] - 6:22, 145:5, 155:2, 159:9</p> <p><b>forward</b> [2] - 54:25, 138:21</p> <p><b>forwarded</b> [3] - 48:14, 53:8, 54:4</p> <p><b>forwarding</b> [1] - 59:1</p> <p><b>four</b> [4] - 10:21, 20:19, 108:9, 108:10</p> <p><b>fourth</b> [1] - 97:8</p> <p><b>Fox</b> [2] - 13:23, 13:25</p> <p><b>FPR</b> [2] - 157:16, 161:21</p> <p><b>fraction</b> [1] - 133:3</p> <p><b>frankly</b> [1] - 17:16</p> <p><b>free</b> [4] - 5:6, 10:10, 10:14, 35:11</p> <p><b>Friedrich</b> [1] - 6:18</p> <p><b>friend</b> [4] - 27:13, 29:9, 93:4, 93:5</p>	<p><b>friendly</b> [3] - 142:15, 142:16</p> <p><b>frivolous</b> [3] - 64:5, 66:15, 136:16</p> <p><b>frontrunner</b> [3] - 12:13, 12:23, 13:13</p> <p><b>fulfill</b> [1] - 19:6</p> <p><b>full</b> [1] - 97:9</p> <p><b>functioning</b> [1] - 17:15</p> <p><b>fund</b> [5] - 20:16, 20:20, 21:18, 21:21, 21:23</p> <p><b>furthered</b> [1] - 85:13</p> <p><b>future</b> [2] - 9:10, 9:19</p>	<p><b>ground</b> [2] - 4:16, 6:2</p> <p><b>group</b> [17] - 16:17, 16:20, 16:21, 17:7, 18:4, 21:4, 37:13, 43:23, 44:12, 50:23, 76:17, 76:23, 77:1, 77:10, 99:12, 150:10, 150:14</p> <p><b>Group</b> [2] - 83:6, 84:18</p> <p><b>groups</b> [4] - 27:21, 27:22, 77:4, 84:12</p> <p><b>guaranteed</b> [1] - 40:8</p> <p><b>guess</b> [14] - 10:16, 36:18, 71:20, 71:21, 85:2, 85:7, 95:13, 100:22, 101:7, 103:1, 111:5, 127:6, 137:3, 156:10</p> <p><b>gun</b> [1] - 154:22</p> <p><b>Gun</b> [1] - 2:20</p> <p><b>guy</b> [2] - 112:17, 155:7</p>	<p><b>heading</b> [1] - 104:11</p> <p><b>headline</b> [3] - 117:21, 117:23, 152:24</p> <p><b>Headline</b> [1] - 2:21</p> <p><b>heads</b> [13] - 18:7, 25:25, 26:1, 26:10, 26:14, 28:18, 37:16, 40:20, 41:19, 41:23, 44:7, 93:25, 110:22</p> <p><b>hear</b> [8] - 22:6, 22:10, 57:19, 73:13, 73:22, 73:23, 134:10, 139:24</p> <p><b>heard</b> [24] - 7:12, 27:9, 29:6, 63:20, 66:13, 75:13, 78:4, 78:9, 78:12, 111:2, 114:6, 118:25, 121:13, 126:2, 134:23, 135:2, 135:8, 136:9, 136:16, 136:18, 136:21, 137:4, 147:23, 148:9</p> <p><b>heated</b> [3] - 135:24, 138:7, 140:7</p> <p><b>Helen</b> [4] - 104:18, 104:19, 104:21, 104:24</p> <p><b>help</b> [12] - 20:24, 32:5, 32:6, 40:11, 46:8, 46:13, 47:7, 47:12, 65:1, 91:14, 133:6, 133:14</p> <p><b>helpful</b> [1] - 9:11</p> <p><b>helps</b> [4] - 46:16, 47:5, 133:10, 142:18</p> <p><b>Henning</b> [1] - 151:1</p> <p><b>hereby</b> [3] - 158:6, 159:6, 160:3</p> <p><b>hereto</b> [1] - 159:10</p> <p><b>hesitation</b> [1] - 32:17</p> <p><b>Hicks</b> [15] - 46:25, 75:10, 77:9, 78:4, 78:7, 78:17, 134:23, 134:25, 137:11, 137:13, 139:11, 139:21, 141:4, 142:16, 142:22</p> <p><b>Hicks'</b> [3] - 77:18, 123:13, 143:1</p> <p><b>high</b> [1] - 93:4</p> <p><b>highest</b> [2] - 101:15, 118:4</p> <p><b>highlighted</b> [2] - 135:16</p> <p><b>highly</b> [2] - 125:24, 127:24</p> <p><b>Hillary</b> [1] - 11:25</p> <p><b>himself</b> [1] - 47:16</p> <p><b>hire</b> [7] - 25:11, 28:14,</p>
<b>G</b>				
<p><b>gambling</b> [1] - 116:21</p> <p><b>Gary</b> [3] - 19:8, 19:12, 44:4</p> <p><b>Gatekeepers</b> [1] - 15:3</p> <p><b>general</b> [6] - 11:7, 18:5, 26:19, 29:21, 87:13, 117:2</p> <p><b>generally</b> [3] - 25:24, 89:5, 103:2</p> <p><b>George</b> [1] - 45:10</p> <p><b>GG971350</b> [1] - 157:21</p> <p><b>girth</b> [1] - 24:25</p> <p><b>gist</b> [2] - 26:19, 70:4</p> <p><b>Giuliani's</b> [1] - 26:13</p> <p><b>given</b> [9] - 4:2, 17:8, 24:25, 27:5, 28:5, 51:7, 70:16, 89:2, 149:13</p> <p><b>Glenn</b> [1] - 153:5</p> <p><b>go-to</b> [1] - 86:8</p> <p><b>Google</b> [3] - 100:19, 100:22, 118:9</p> <p><b>GOP</b> [4] - 11:21, 12:25, 13:1, 25:2</p> <p><b>Gorka</b> [1] - 149:22</p> <p><b>gos</b> [1] - 95:6</p> <p><b>government</b> [3] - 45:3, 45:4, 97:5</p> <p><b>government's</b> [1] - 118:4</p> <p><b>governor</b> [2] - 8:22, 85:14</p> <p><b>grab</b> [1] - 35:10</p> <p><b>great</b> [5] - 7:15, 9:22, 17:21, 28:5, 83:10</p> <p><b>GREENBERG</b> [1] - 2:5</p> <p><b>grew</b> [1] - 97:16</p> <p><b>Grindr</b> [1] - 131:9</p> <p><b>Grisham</b> [4] - 2:19, 105:23, 109:15, 111:6</p> <p><b>groping</b> [1] - 114:4</p>				
<b>H</b>				
<p><b>Haberman</b> [1] - 153:5</p> <p><b>Hagerty</b> [1] - 17:6</p> <p><b>Hagin</b> [1] - 94:22</p> <p><b>hair</b> [1] - 139:15</p> <p><b>half</b> [1] - 7:7</p> <p><b>hand</b> [3] - 52:1, 157:10, 158:16</p> <p><b>handle</b> [1] - 112:23</p> <p><b>handled</b> [1] - 126:11</p> <p><b>handling</b> [4] - 11:12, 54:16, 68:13, 99:4</p> <p><b>hands</b> [2] - 56:12, 56:13</p> <p><b>hang</b> [1] - 96:8</p> <p><b>Hannity</b> [1] - 14:1</p> <p><b>happy</b> [2] - 83:24, 105:11</p> <p><b>hard</b> [2] - 15:13, 109:1</p> <p><b>harder</b> [2] - 87:7, 87:19</p> <p><b>Harvard</b> [3] - 61:2, 124:5, 124:17</p> <p><b>Hatch's</b> [1] - 25:10</p> <p><b>Haylan</b> [1] - 150:22</p> <p><b>he..</b> [1] - 141:6</p> <p><b>head</b> [20] - 8:1, 15:15, 18:16, 19:10, 37:13, 37:22, 43:22, 44:13, 44:15, 44:21, 50:19, 54:23, 55:2, 55:6, 60:6, 60:8, 61:19, 94:7, 104:17, 113:6</p> <p><b>head's</b> [1] - 56:13</p> <p><b>headed</b> [4] - 20:16, 94:14, 94:23, 136:2</p>				





<b>com</b> [2] - 2:7, 161:5 <b>Jeb</b> [1] - 91:16 <b>Jeff</b> [5] - 29:20, 30:6, 32:6, 32:7, 32:15 <b>Jessica</b> [1] - 150:15 <b>Jim</b> [2] - 145:24, 145:25 <b>job</b> [40] - 5:23, 18:22, 27:1, 29:22, 30:1, 40:7, 40:9, 41:7, 51:6, 59:24, 61:7, 72:20, 74:15, 74:21, 74:23, 75:5, 77:6, 79:16, 79:20, 80:1, 83:6, 83:11, 85:20, 85:24, 86:1, 86:24, 87:7, 87:20, 91:24, 92:6, 92:13, 93:4, 93:14, 105:15, 115:3, 131:18, 132:5, 133:7, 154:4 <b>jobs</b> [13] - 18:4, 18:5, 18:12, 18:14, 40:20, 86:6, 86:9, 93:12, 132:8, 132:16, 132:22, 133:3 <b>Joe</b> [1] - 94:22 <b>John</b> [4] - 12:4, 83:24, 84:13, 116:6 <b>joined</b> [2] - 151:10, 155:16 <b>joining</b> [1] - 155:10 <b>jotted</b> [1] - 20:9 <b>Journal</b> [1] - 125:7 <b>judge</b> [3] - 90:15, 146:2, 146:22 <b>July</b> [6] - 8:3, 33:11, 33:12, 95:19, 152:9, 153:6 <b>jump</b> [1] - 34:16 <b>jumping</b> [2] - 83:10, 83:15 <b>June</b> [1] - 12:1 <b>JURAT</b> [1] - 159:1 <b>justice</b> [2] - 91:11, 103:18 <b>Justin</b> [1] - 130:23	<b>keeping</b> [1] - 98:4 <b>keeps</b> [1] - 128:4 <b>Keith</b> [1] - 135:24 <b>Kelly</b> [3] - 83:24, 84:13, 150:24 <b>Kellyanne</b> [1] - 86:10 <b>kick</b> [1] - 74:22 <b>kill</b> [1] - 111:9 <b>killed</b> [3] - 101:11, 102:9, 108:15 <b>kind</b> [17] - 23:9, 36:14, 36:15, 46:20, 55:22, 63:22, 70:13, 84:3, 84:4, 88:19, 99:6, 102:16, 105:9, 126:1, 131:6, 148:4, 148:5 <b>kindly</b> [1] - 119:4 <b>knowing</b> [1] - 133:5 <b>knowledge</b> [1] - 59:20 <b>known</b> [12] - 12:11, 12:12, 13:1, 13:8, 13:22, 25:2, 26:3, 75:7, 103:10, 113:18 <b>Kudlow</b> [1] - 14:1 <b>Kushner</b> [6] - 17:3, 17:19, 45:1, 56:1, 93:6, 93:7 <b>Kushner's</b> [2] - 55:24, 56:6	69:4, 69:8, 69:11, 70:7, 70:12, 74:18, 75:17, 75:20, 92:3 <b>lead</b> [1] - 77:10 <b>leader</b> [1] - 36:16 <b>leads</b> [1] - 131:14 <b>League</b> [1] - 124:10 <b>leaking</b> [1] - 23:1 <b>learn</b> [2] - 45:19, 134:23 <b>learned</b> [5] - 137:8, 144:6, 144:10, 144:13, 144:20 <b>least</b> [9] - 16:11, 36:9, 51:1, 74:17, 94:3, 126:6, 132:11, 141:15 <b>leave</b> [9] - 22:23, 22:25, 57:15, 86:25, 87:1, 91:23, 112:22, 146:18 <b>leaves</b> [1] - 140:2 <b>led</b> [1] - 110:14 <b>left</b> [15] - 22:25, 23:18, 85:12, 95:18, 99:6, 107:1, 109:15, 112:5, 112:13, 120:8, 120:11, 122:14, 144:4, 149:25 <b>legal</b> [3] - 60:13, 60:16, 144:21 <b>lengthy</b> [1] - 53:18 <b>letter</b> [1] - 58:5 <b>level</b> [6] - 11:15, 25:21, 55:12, 85:25, 126:9 <b>Lewandowski</b> [8] - 77:19, 78:4, 78:8, 78:17, 135:15, 137:12, 137:21, 143:2 <b>Liaison</b> [3] - 27:20, 44:19, 45:2 <b>Liddell</b> [1] - 44:24 <b>lie</b> [2] - 38:15, 38:17 <b>life</b> [2] - 102:15, 102:25 <b>light</b> [6] - 55:11, 65:7, 74:19, 116:10, 136:12, 142:17 <b>likely</b> [3] - 54:5, 90:2, 113:18 <b>limit</b> [1] - 127:19 <b>limited</b> [1] - 63:23 <b>Lindsay</b> [1] - 151:5 <b>Line</b> [1] - 3:2 <b>LINE</b> [10] - 160:7, 160:8, 160:9, 160:10, 160:11,	160:12, 160:13, 160:14, 160:15, 160:16 <b>line</b> [2] - 36:2, 53:20 <b>link</b> [6] - 30:25, 31:3, 31:5, 118:14, 118:17, 153:3 <b>list</b> [9] - 15:14, 38:23, 60:24, 93:1, 97:14, 97:16, 98:2, 98:4, 99:24 <b>listed</b> [2] - 74:9, 74:10 <b>listen</b> [4] - 54:22, 54:24, 88:6, 129:19 <b>listening</b> [1] - 47:22 <b>lists</b> [2] - 15:6, 38:25 <b>literal</b> [2] - 60:22, 60:23 <b>live</b> [1] - 9:3 <b>LLP</b> [1] - 2:5 <b>LOCATION</b> [1] - 1:12 <b>Log</b> [2] - 145:6, 145:8 <b>look</b> [10] - 34:9, 50:18, 60:18, 67:17, 93:14, 93:15, 96:3, 96:13, 97:8, 141:25 <b>looked</b> [2] - 60:10, 75:17 <b>looking</b> [9] - 34:14, 54:5, 55:12, 67:18, 95:22, 96:24, 135:18, 141:8, 146:3 <b>looks</b> [4] - 38:1, 110:1, 110:5, 141:8 <b>lost</b> [2] - 46:15, 88:19 <b>Lou</b> [1] - 14:1 <b>loud</b> [2] - 70:6, 135:20 <b>Love</b> [1] - 150:24 <b>loyal</b> [1] - 90:12 <b>loyalty</b> [7] - 29:23, 29:24, 152:17, 153:11, 153:17, 153:19, 154:2 <b>lucrative</b> [1] - 127:10 <b>Lynne</b> [1] - 131:17	93:18 <b>main</b> [2] - 25:25, 40:19 <b>major</b> [2] - 94:2, 94:8 <b>maker</b> [1] - 93:20 <b>Mallory</b> [5] - 16:14, 20:10, 20:13, 20:16, 21:10 <b>Manafort</b> [1] - 93:4 <b>manage</b> [1] - 121:2 <b>Marc</b> [1] - 17:3 <b>March</b> [6] - 113:23, 116:16, 146:16, 154:23, 155:3, 161:16 <b>Mark</b> [1] - 83:23 <b>mark</b> [2] - 119:5, 139:1 <b>marked</b> [13] - 2:25, 42:22, 42:24, 52:23, 56:23, 96:18, 106:6, 109:22, 117:14, 119:8, 120:20, 134:15, 143:10 <b>massage</b> [1] - 149:4 <b>massaged</b> [1] - 148:15 <b>match</b> [3] - 78:7, 132:23, 143:1 <b>matrix</b> [8] - 59:12, 59:19, 59:21, 60:23, 75:3, 75:4, 76:2, 76:5 <b>matter</b> [7] - 4:15, 10:6, 68:14, 102:25, 129:2, 146:10, 161:13 <b>matters</b> [4] - 20:17, 112:6, 112:20, 115:11 <b>Max</b> [3] - 114:8, 114:13, 114:24 <b>McCain</b> [1] - 12:4 <b>McEntee</b> [1] - 116:6 <b>McEntee's</b> [1] - 116:20 <b>McGahn</b> [22] - 3:5, 18:18, 19:3, 48:16, 48:18, 48:21, 49:18, 49:19, 49:20, 50:2, 54:7, 54:8, 58:8, 65:16, 66:7, 94:22, 99:2, 112:7, 112:17, 130:1, 130:8, 130:9 <b>McGahn's</b> [3] - 123:7, 125:9, 129:23 <b>Meadows</b> [1] - 83:23 <b>mean</b> [120] - 9:17, 9:18, 9:21, 12:5, 12:11, 13:7, 13:8, 14:1, 16:4, 16:5, 16:22, 18:12, 21:12, 23:9, 25:21, 26:9, 27:4, 27:5, 28:13,
<b>K</b>	<b>L</b>	<b>M</b>	<b>M</b>	
<b>K-A-R-R-O-L</b> [2] - 145:21, 145:22 <b>Karrol</b> [4] - 112:18, 145:19, 145:21, 145:25 <b>Katie</b> [6] - 21:2, 21:6, 21:17, 22:11, 23:18, 86:15 <b>keep</b> [6] - 20:24, 42:8, 58:18, 77:6, 88:16, 97:14	<b>LA</b> [1] - 2:5 <b>lack</b> [1] - 74:23 <b>Lady's</b> [1] - 106:14 <b>large</b> [2] - 16:24, 52:5 <b>Large</b> [1] - 1:22 <b>Las</b> [1] - 48:5 <b>last</b> [5] - 8:24, 78:25, 104:23, 112:18, 151:13 <b>lasted</b> [1] - 8:22 <b>late</b> [1] - 13:6 <b>Latina</b> [1] - 104:21 <b>law</b> [5] - 6:17, 61:2, 62:13, 124:5, 158:12 <b>lawsuit</b> [10] - 10:24, 64:4, 64:7, 64:12, 64:13, 64:21, 65:3, 79:8, 136:16, 148:3 <b>lawyer</b> [5] - 10:5, 10:14, 50:2, 54:9, 155:6 <b>lawyer's</b> [1] - 56:12 <b>lawyers</b> [22] - 53:8, 54:5, 54:16, 55:11, 56:11, 57:15, 57:17, 57:20, 59:5, 67:18, 68:13, 68:17, 69:1,	160:10, 160:11,	<b>Madam</b> [1] - 42:2 <b>Maggie</b> [1] - 153:5 <b>mail</b> [25] - 2:4, 2:7, 2:17, 2:17, 39:1, 39:2, 39:4, 39:12, 41:4, 41:13, 41:17, 43:8, 51:10, 52:11, 52:15, 52:23, 53:2, 54:5, 57:2, 57:13, 59:2, 96:11, 134:17, 145:13, 146:6 <b>mails</b> [2] - 62:23,	



<p>31:17, 32:14, 32:15, 33:15, 33:16, 34:11, 36:13, 40:22, 43:11, 43:12, 45:14, 46:5, 46:6, 49:9, 49:12, 49:14, 49:16, 53:6, 55:3, 55:9, 55:10, 57:16, 58:1, 58:12, 59:4, 60:2, 60:14, 60:15, 60:18, 60:19, 61:9, 61:12, 61:18, 62:21, 64:13, 68:25, 70:19, 71:20, 72:18, 77:20, 81:1, 81:14, 81:15, 83:22, 84:1, 85:1, 85:21, 86:5, 86:7, 86:25, 87:11, 88:2, 88:9, 88:25, 89:17, 91:2, 92:23, 94:13, 95:12, 100:2, 101:7, 101:18, 102:13, 102:25, 103:2, 103:10, 104:1, 114:15, 116:5, 117:12, 124:15, 125:1, 126:10, 127:1, 127:2, 127:3, 128:22, 130:2, 132:7, 132:8, 132:13, 132:21, 133:9, 133:13, 133:14, 137:2, 140:12, 146:8, 147:21, 148:11, 156:1</p> <p><b>mean..</b> [3] - 31:17, 80:22, 91:17</p> <p><b>meaning</b> [2] - 43:17, 59:20</p> <p><b>means</b> [4] - 4:23, 5:2, 39:19, 44:18</p> <p><b>meant</b> [3] - 49:10, 60:22, 92:24</p> <p><b>media</b> [3] - 84:4, 139:9, 141:5</p> <p><b>meeting</b> [4] - 39:18, 46:3, 46:6, 50:13</p> <p><b>meetings</b> [2] - 16:24, 46:6</p> <p><b>meld</b> [1] - 88:12</p> <p><b>member</b> [2] - 106:16, 106:19</p> <p><b>members</b> [1] - 6:21</p> <p><b>memorandum</b> [1] - 96:25</p> <p><b>Memorandum</b> [1] - 2:18</p> <p><b>memory</b> [9] - 46:9, 46:13, 47:12, 65:22,</p>	<p>70:21, 105:9, 142:12, 142:18, 142:20</p> <p><b>mention</b> [1] - 142:25</p> <p><b>mentioned</b> [18] - 12:8, 17:19, 17:20, 20:9, 20:10, 27:25, 28:7, 29:7, 50:10, 55:23, 65:17, 66:1, 79:15, 93:7, 121:23, 142:22, 142:24</p> <p><b>mentions</b> [4] - 118:7, 118:10, 118:15, 152:10</p> <p><b>message</b> [1] - 63:21</p> <p><b>met</b> [3] - 50:9, 61:11, 91:4</p> <p><b>method</b> [1] - 126:14</p> <p><b>Mexico</b> [1] - 99:19</p> <p><b>MIAMI</b> [2] - 157:4, 158:3</p> <p><b>Miami</b> [4] - 2:3, 104:22, 124:22, 138:11</p> <p><b>MIAMI-DADE</b> [2] - 157:4, 158:3</p> <p><b>Michael</b> [1] - 6:18</p> <p><b>mid</b> [4] - 14:7, 48:25, 81:24, 85:25</p> <p><b>mid-deposition</b> [1] - 81:24</p> <p><b>mid-level</b> [1] - 85:25</p> <p><b>mid-morning</b> [1] - 48:25</p> <p><b>mid-November</b> [1] - 14:7</p> <p><b>middle</b> [1] - 100:5</p> <p><b>might</b> [10] - 18:13, 23:15, 24:3, 34:22, 45:16, 46:8, 57:9, 63:1, 66:25, 118:14</p> <p><b>Mike</b> [5] - 16:15, 16:25, 20:11, 20:13, 20:17</p> <p><b>Mike's</b> [1] - 21:10</p> <p><b>Miller</b> [41] - 2:16, 19:12, 35:23, 36:6, 36:25, 37:13, 38:6, 38:15, 39:17, 40:3, 43:12, 46:3, 46:25, 47:11, 49:2, 49:24, 51:7, 55:5, 55:14, 55:25, 56:1, 56:8, 57:4, 57:13, 68:11, 68:22, 69:6, 69:20, 69:23, 71:3, 71:10, 75:21, 79:1, 86:20, 91:22, 114:8, 114:24, 128:4, 128:6, 149:13,</p>	<p>150:12</p> <p><b>Miller's</b> [6] - 35:3, 147:20, 147:23, 148:14, 148:21, 149:3</p> <p><b>mind</b> [7] - 18:3, 34:18, 45:18, 55:6, 60:16, 86:4, 118:17</p> <p><b>mine</b> [5] - 16:15, 73:15, 73:21, 84:17, 116:3</p> <p><b>minor</b> [1] - 8:21</p> <p><b>minute</b> [1] - 154:18</p> <p><b>minutes</b> [6] - 5:3, 8:23, 8:24, 58:19, 62:20, 79:5</p> <p><b>misdemeanor</b> [1] - 155:12</p> <p><b>missing</b> [1] - 104:4</p> <p><b>misspoke</b> [1] - 112:15</p> <p><b>misstate</b> [1] - 69:2</p> <p><b>Mitt</b> [1] - 12:3</p> <p><b>moment</b> [2] - 138:17, 138:22</p> <p><b>money</b> [1] - 11:10</p> <p><b>month</b> [1] - 123:2</p> <p><b>months</b> [23] - 15:12, 21:7, 22:16, 22:17, 23:19, 35:24, 81:10, 81:11, 83:4, 83:9, 95:9, 95:12, 95:17, 95:18, 108:10, 116:16, 121:4, 123:19, 123:22, 126:7, 127:2, 127:3, 155:15</p> <p><b>Moore</b> [1] - 14:1</p> <p><b>morning</b> [9] - 4:12, 4:13, 45:25, 46:2, 47:10, 48:22, 48:24, 48:25, 69:13</p> <p><b>most</b> [14] - 12:24, 13:5, 13:12, 15:20, 18:9, 25:14, 54:5, 72:9, 87:10, 93:11, 93:16, 94:1, 94:23, 95:9</p> <p><b>motion</b> [1] - 146:13</p> <p><b>move</b> [1] - 54:25</p> <p><b>moved</b> [1] - 135:24</p> <p><b>MR</b> [102] - 6:4, 7:19, 8:9, 8:16, 9:12, 12:14, 13:14, 15:18, 16:12, 17:23, 24:9, 25:3, 25:16, 27:11, 28:10, 30:2, 31:25, 35:6, 37:4, 37:20, 38:3, 38:8, 38:16, 41:10, 42:1, 42:6, 43:10, 51:20, 51:24,</p>	<p>52:8, 52:18, 52:21, 54:14, 54:19, 58:9, 60:1, 61:8, 62:1, 63:12, 63:25, 67:12, 68:7, 69:16, 71:6, 71:14, 72:4, 72:14, 73:1, 73:24, 74:25, 78:11, 78:21, 79:18, 80:19, 81:17, 81:21, 87:16, 89:7, 93:9, 93:23, 96:1, 100:9, 100:21, 101:6, 102:11, 103:8, 104:8, 105:16, 106:17, 108:17, 110:10, 116:11, 121:6, 123:14, 123:23, 124:12, 127:14, 128:25, 133:8, 136:23, 137:16, 137:23, 138:1, 138:23, 140:8, 143:20, 144:6, 144:10, 145:1, 145:7, 146:21, 147:2, 147:5, 147:14, 148:17, 149:6, 149:15, 152:22, 153:7, 155:18, 156:3, 156:9</p> <p><b>Mugshot</b> [1] - 2:19</p> <p><b>mugshot</b> [3] - 110:14, 154:21, 154:22</p> <p><b>Munisteri</b> [1] - 45:11</p> <p><b>Museum</b> [1] - 138:11</p> <p><b>mute</b> [2] - 134:7, 134:9</p>	<p>112:1</p> <p><b>National</b> [2] - 8:2, 11:9</p> <p><b>natural</b> [1] - 60:7</p> <p><b>naturally</b> [1] - 86:18</p> <p><b>NEC</b> [1] - 19:10</p> <p><b>necessarily</b> [3] - 33:20, 41:7, 109:14</p> <p><b>necessary</b> [1] - 109:13</p> <p><b>need</b> [10] - 4:25, 5:1, 5:5, 5:9, 5:23, 19:5, 53:17, 134:10, 143:18, 156:2</p> <p><b>needed</b> [4] - 20:23, 46:12, 56:2, 132:24</p> <p><b>needs</b> [3] - 60:9, 60:18, 62:20</p> <p><b>negatively</b> [1] - 137:5</p> <p><b>network</b> [1] - 139:18</p> <p><b>never</b> [24] - 33:2, 37:6, 37:7, 58:25, 59:2, 59:11, 61:14, 64:14, 64:15, 75:2, 75:5, 75:15, 76:2, 76:4, 76:8, 76:19, 78:23, 86:23, 88:5, 117:17, 118:7, 118:17, 136:18, 153:16</p> <p><b>nevertheless</b> [1] - 82:19</p> <p><b>new</b> [1] - 45:1</p> <p><b>NEW</b> [1] - 1:1</p> <p><b>New</b> [5] - 2:6, 99:19, 152:8, 152:18, 155:8</p> <p><b>Newbold</b> [4] - 96:9, 97:3, 97:9, 97:20</p> <p><b>newbold</b> [1] - 97:13</p> <p><b>News</b> [2] - 13:23, 13:25</p> <p><b>news</b> [1] - 48:8</p> <p><b>next</b> [7] - 39:20, 39:24, 41:5, 44:20, 51:10, 53:20, 120:25</p> <p><b>nice</b> [1] - 83:10</p> <p><b>nicely</b> [1] - 11:5</p> <p><b>NO</b> [2] - 1:3, 161:9</p> <p><b>no-gos</b> [1] - 95:6</p> <p><b>no..</b> [1] - 6:3</p> <p><b>nominated</b> [1] - 7:3</p> <p><b>nomination</b> [4] - 11:11, 88:17, 88:20, 89:5</p> <p><b>nominee</b> [5] - 14:2, 89:15, 89:16, 89:21, 139:18</p> <p><b>non</b> [1] - 142:14</p> <p><b>non-pervasive</b> [1] - 142:14</p> <p><b>none</b> [2] - 86:4, 122:12</p> <p><b>nonemployment</b> [3] -</p>
--	---	--	--	---

<p>72:25, 73:9, 74:6  <b>nonetheless</b> [4] - 89:24, 116:22, 122:7, 127:24  <b>nonliteral</b> [1] - 60:25  <b>normal</b> [2] - 60:10, 60:20  <b>Notary</b> [4] - 1:21, 4:3, 157:16, 159:23  <b>note</b> [1] - 53:19  <b>noted</b> [1] - 160:5  <b>notes</b> [3] - 34:12, 151:15, 158:10  <b>nothing</b> [4] - 6:4, 99:6, 118:9, 132:9  <b>notice</b> [1] - 161:18  <b>Notice</b> [1] - 1:22  <b>November</b> [2] - 14:7, 33:11  <b>number</b> [7] - 9:2, 21:14, 42:2, 51:25, 52:22, 97:9  <b>NY</b> [1] - 2:6</p>	<p>100:21, 102:11, 103:8, 104:8, 105:16, 106:17, 108:17, 110:10, 121:6, 123:14, 123:23, 127:14, 133:8, 136:23, 140:8, 149:6, 149:15  <b>objects</b> [1] - 5:19  <b>obscure</b> [1] - 155:6  <b>obtained</b> [2] - 83:5, 122:6  <b>obtaining</b> [1] - 133:6  <b>obviously</b> [10] - 11:10, 17:2, 21:4, 47:6, 54:24, 67:24, 99:6, 133:2, 133:14, 147:22  <b>occasional</b> [2] - 25:25, 94:5  <b>occasionally</b> [3] - 95:5, 99:2, 113:1  <b>occasions</b> [1] - 87:24  <b>occupation</b> [1] - 6:15  <b>October</b> [4] - 31:22, 32:1, 32:12, 155:8  <b>OF</b> [12] - 1:1, 1:18, 2:2, 2:5, 157:1, 157:3, 157:4, 158:1, 158:2, 158:3, 159:2, 159:3  <b>Off-the-record</b> [1] - 31:7  <b>offense</b> [5] - 34:13, 87:5, 101:15, 102:8, 142:2  <b>offer</b> [1] - 58:22  <b>Office</b> [2] - 27:20, 45:2  <b>office</b> [24] - 8:7, 8:15, 8:20, 9:6, 9:7, 9:19, 16:16, 20:12, 20:14, 21:1, 25:10, 44:19, 45:1, 97:6, 97:20, 106:14, 118:5, 121:1, 123:11, 125:18, 126:12, 151:25, 161:14  <b>offices</b> [1] - 94:23  <b>official</b> [4] - 6:11, 146:11, 157:10, 158:17  <b>officials</b> [2] - 32:17, 97:18  <b>old</b> [1] - 48:7  <b>Omarosa</b> [7] - 26:12, 26:23, 29:7, 43:22, 45:8, 82:22, 84:23  <b>Omarosa's</b> [2] - 27:1, 44:11  <b>ON</b> [2] - 2:2, 2:5</p>	<p><b>onboard</b> [3] - 50:21, 50:22, 154:13  <b>onboarding</b> [1] - 99:23  <b>once</b> [11] - 14:2, 22:9, 50:5, 74:17, 85:12, 88:17, 88:20, 121:22, 136:1, 154:15  <b>one</b> [71] - 5:3, 6:23, 9:2, 11:23, 12:17, 14:19, 14:21, 14:22, 15:5, 15:8, 26:12, 26:13, 30:9, 41:18, 42:4, 42:10, 42:20, 42:25, 44:22, 45:16, 45:17, 46:25, 47:8, 47:24, 48:1, 51:17, 51:18, 59:6, 62:3, 63:16, 66:9, 70:20, 70:21, 76:19, 96:9, 98:13, 106:9, 107:19, 109:8, 110:17, 115:4, 116:8, 117:11, 117:17, 118:1, 118:8, 118:17, 119:2, 119:11, 119:21, 122:16, 125:23, 126:6, 126:23, 126:24, 130:22, 131:2, 132:11, 133:20, 136:5, 147:22, 149:18, 149:21, 152:6, 154:17, 154:18  <b>one..</b> [1] - 35:9  <b>ones</b> [5] - 18:3, 26:6, 80:18, 107:18, 117:4  <b>open</b> [2] - 153:1, 153:3  <b>openly</b> [1] - 12:13  <b>operates</b> [1] - 132:18  <b>operation</b> [2] - 11:13, 100:5  <b>operations</b> [3] - 113:15, 115:6, 122:19  <b>opinion</b> [17] - 26:22, 28:21, 63:9, 63:17, 71:17, 72:8, 72:16, 75:6, 103:4, 111:23, 115:24, 115:25, 116:1, 116:3, 116:4, 123:21, 127:19  <b>opinions</b> [3] - 61:10, 124:14, 133:1  <b>OPL</b> [5] - 43:24, 44:16, 44:17, 45:11, 45:17</p>	<p><b>opportunity</b> [1] - 156:1  <b>opposed</b> [2] - 13:17, 83:18  <b>opposite</b> [1] - 25:5  <b>opposition</b> [3] - 13:11, 25:1, 104:6  <b>ops</b> [1] - 110:25  <b>opt</b> [1] - 156:8  <b>opted</b> [2] - 89:2, 91:22  <b>options</b> [4] - 18:20, 18:23, 18:24, 19:10  <b>or..</b> [2] - 99:25, 153:13  <b>oral</b> [1] - 145:14  <b>orbit</b> [1] - 128:5  <b>order</b> [4] - 19:5, 81:18, 122:4, 122:7  <b>org</b> [25] - 36:9, 37:1, 37:6, 37:7, 37:15, 37:18, 38:1, 38:20, 39:23, 40:11, 40:12, 40:15, 40:16, 40:18, 40:23, 40:24, 40:25, 41:1, 51:7, 53:21, 54:3, 54:4, 61:13, 74:9  <b>organization</b> [1] - 6:24  <b>organizational</b> [1] - 11:14  <b>organized</b> [2] - 20:24, 142:25  <b>organizers</b> [1] - 94:16  <b>organizing</b> [1] - 11:12  <b>original</b> [2] - 29:23, 161:17  <b>originally</b> [1] - 10:17  <b>Orlando</b> [1] - 148:3  <b>others'</b> [1] - 124:10  <b>otherwise</b> [1] - 158:14  <b>outgoing</b> [2] - 27:2, 29:8  <b>outline</b> [1] - 90:8  <b>outreach</b> [9] - 27:20, 28:6, 44:21, 44:22, 44:25, 45:4, 45:6, 45:12, 61:3  <b>outs</b> [2] - 122:20, 133:18  <b>outside</b> [7] - 16:16, 20:12, 20:14, 20:25, 26:9, 78:8, 151:25  <b>outward</b> [2] - 27:2, 29:8  <b>outwardly</b> [1] - 90:1  <b>oval</b> [3] - 77:11, 121:1, 125:18  <b>overall</b> [6] - 40:18, 87:12, 88:25, 90:17, 126:22, 142:9  <b>overseeing</b> [1] - 11:13</p>	<p><b>overseen</b> [1] - 100:4  <b>Oversight</b> [2] - 2:19, 97:2  <b>overturned</b> [1] - 97:16  <b>own</b> [2] - 41:21, 94:1  <b>Oxford</b> [1] - 104:5</p>
<b>P</b>				
<p><b>P.A.C.T</b> [3] - 23:20, 23:25, 24:20  <b>P.A.C.T.</b> [1] - 24:5  <b>p.m</b> [5] - 1:14, 46:14, 46:23, 47:2, 156:20  <b>P1</b> [1] - 52:23  <b>P2</b> [1] - 52:24  <b>page</b> [8] - 2:23, 77:21, 77:22, 78:5, 96:21, 96:22, 97:8, 159:10  <b>PAGE</b> [12] - 2:15, 159:1, 160:7, 160:8, 160:9, 160:10, 160:11, 160:12, 160:13, 160:14, 160:15, 160:16  <b>Page</b> [1] - 3:2  <b>pages</b> [4] - 52:7, 115:8, 158:9, 159:7  <b>paid</b> [2] - 10:8, 81:4  <b>Palm</b> [1] - 79:2  <b>paper</b> [1] - 103:18  <b>paragraph</b> [1] - 97:9  <b>paramour</b> [1] - 135:14  <b>parlay</b> [1] - 127:10  <b>parlors</b> [2] - 148:15, 149:4  <b>part</b> [11] - 10:17, 13:5, 15:20, 18:9, 20:4, 42:12, 70:22, 72:23, 111:25, 148:4, 149:8  <b>participated</b> [1] - 72:21  <b>particular</b> [11] - 15:22, 18:2, 28:16, 28:17, 38:21, 41:11, 44:12, 77:1, 79:23, 92:21, 117:9  <b>particularly</b> [19] - 11:19, 11:20, 14:18, 20:5, 21:5, 22:1, 22:11, 22:19, 32:25, 84:3, 84:4, 89:13, 114:14, 132:17, 136:8, 136:24, 137:1, 137:11, 142:19  <b>parties</b> [3] - 4:1, 158:14, 161:18  <b>partly</b> [1] - 88:13  <b>partners</b> [1] - 6:24</p>				





<p><b>parts</b> [1] - 66:19</p> <p><b>party</b> [8] - 11:14, 11:16, 12:6, 12:10, 12:12, 13:11, 73:21, 161:18</p> <p><b>pass</b> [6] - 107:20, 108:4, 111:22, 112:14, 114:24, 115:15</p> <p><b>passed</b> [5] - 107:25, 108:12, 111:10, 115:17, 115:22</p> <p><b>passing</b> [1] - 107:23</p> <p><b>passive</b> [1] - 72:24</p> <p><b>past</b> [9] - 6:20, 7:17, 8:13, 8:19, 48:2, 48:8, 53:20, 98:2, 113:9</p> <p><b>pattern</b> [2] - 142:13, 142:14</p> <p><b>Patton</b> [1] - 131:17</p> <p><b>Paul</b> [1] - 93:3</p> <p><b>Pawlenty</b> [1] - 12:4</p> <p><b>pay</b> [1] - 114:6</p> <p><b>paying</b> [1] - 34:10</p> <p><b>PDF</b> [2] - 42:9, 52:5</p> <p><b>peg</b> [1] - 18:13</p> <p><b>penalty</b> [1] - 5:9</p> <p><b>Pence</b> [1] - 16:25</p> <p><b>pending</b> [2] - 81:22, 122:13</p> <p><b>people</b> [65] - 13:3, 16:6, 16:16, 16:22, 17:7, 19:5, 20:11, 24:13, 26:1, 26:3, 26:8, 28:15, 28:17, 32:23, 38:19, 50:25, 60:3, 66:3, 72:9, 79:19, 80:14, 80:21, 80:25, 81:3, 81:4, 83:12, 83:16, 85:1, 86:5, 86:11, 86:12, 86:14, 86:16, 86:18, 88:7, 90:14, 91:4, 93:12, 93:16, 95:6, 102:23, 105:17, 110:16, 110:17, 110:20, 110:21, 110:22, 111:9, 111:14, 111:15, 113:5, 114:25, 115:3, 121:7, 121:12, 122:19, 122:22, 125:20, 129:19, 132:23, 132:24, 137:4, 154:4</p> <p><b>perceive</b> [4] - 59:12, 59:18, 59:20, 90:5</p> <p><b>perceived</b> [1] - 87:10</p> <p><b>percent</b> [5] - 23:23,</p>	<p>81:12, 112:6, 112:13, 151:3</p> <p><b>percentage</b> [1] - 112:16</p> <p><b>perception</b> [2] - 88:5, 124:25</p> <p><b>perfect</b> [2] - 5:14, 63:4</p> <p><b>perhaps</b> [4] - 11:25, 41:15, 124:15, 132:16</p> <p><b>period</b> [6] - 35:24, 68:6, 73:11, 95:16, 120:12, 120:15</p> <p><b>perjury</b> [1] - 5:10</p> <p><b>permanent</b> [1] - 127:4</p> <p><b>person</b> [25] - 14:13, 18:2, 22:12, 27:24, 36:18, 36:19, 40:6, 44:1, 44:15, 47:1, 61:6, 73:8, 86:8, 90:10, 93:14, 93:15, 102:16, 102:18, 106:11, 107:20, 115:13, 126:15, 149:21, 151:8, 152:3</p> <p><b>personal</b> [9] - 20:18, 27:13, 29:8, 97:5, 97:23, 115:6, 127:18, 148:7, 149:14</p> <p><b>personalities</b> [2] - 133:1, 133:19</p> <p><b>personality</b> [1] - 27:5</p> <p><b>personality-wise</b> [1] - 27:5</p> <p><b>personally</b> [4] - 28:14, 60:24, 87:22, 157:8</p> <p><b>personnel</b> [5] - 14:18, 14:19, 17:14, 94:9, 132:22</p> <p><b>perspective</b> [1] - 56:12</p> <p><b>pertain</b> [1] - 66:25</p> <p><b>pervasive</b> [2] - 142:13, 142:14</p> <p><b>phone</b> [4] - 48:21, 49:18, 67:8, 69:11</p> <p><b>phonetic</b> [1] - 150:22</p> <p><b>photo</b> [4] - 119:13, 119:17, 120:25, 121:19</p> <p><b>Photo</b> [1] - 2:23</p> <p><b>phrasing</b> [1] - 36:15</p> <p><b>physically</b> [3] - 4:2, 119:3, 128:6</p> <p><b>pick</b> [1] - 133:17</p> <p><b>picnic</b> [1] - 12:2</p> <p><b>picture</b> [1] - 119:12</p> <p><b>pictures</b> [1] - 119:20</p> <p><b>Pigs</b> [1] - 138:10</p>	<p><b>pinged</b> [1] - 86:17</p> <p><b>pipeline</b> [6] - 61:7, 92:22, 92:23, 112:13, 112:16, 112:17</p> <p><b>place</b> [4] - 5:4, 6:16, 59:13, 65:11</p> <p><b>placed</b> [1] - 30:16</p> <p><b>places</b> [1] - 124:11</p> <p><b>Plaintiff</b> [1] - 1:5</p> <p><b>plaintiff</b> [1] - 4:15</p> <p><b>PLAINTIFF</b> [1] - 2:2</p> <p><b>Plaintiff's</b> [1] - 42:21, 42:23, 56:22, 96:17, 106:5, 109:21, 117:13, 119:7, 120:19, 134:14, 143:9</p> <p><b>PLAINTIFFS</b> [1] - 2:15</p> <p><b>plan</b> [1] - 133:21</p> <p><b>plane</b> [3] - 39:20, 79:10, 150:11</p> <p><b>planner</b> [2] - 131:18, 132:5</p> <p><b>plans</b> [1] - 9:18</p> <p><b>plausible</b> [1] - 56:8</p> <p><b>play</b> [2] - 138:14, 140:21</p> <p><b>playing</b> [1] - 139:3</p> <p><b>Playing</b> [1] - 140:23</p> <p><b>plenty</b> [5] - 13:16, 46:7, 83:16, 86:3, 148:1</p> <p><b>plugging</b> [1] - 86:11</p> <p><b>plus</b> [1] - 79:25</p> <p><b>point</b> [30] - 9:10, 14:15, 17:10, 26:25, 28:21, 50:24, 51:1, 51:2, 51:6, 51:8, 54:15, 55:4, 57:13, 58:3, 63:19, 64:25, 70:19, 83:10, 83:15, 86:16, 87:1, 91:22, 92:2, 95:18, 99:4, 115:14, 122:23, 134:22, 147:24, 149:18</p> <p><b>policy</b> [12] - 18:12, 18:14, 19:8, 43:15, 43:20, 43:22, 44:3, 44:6, 44:7, 44:12, 44:14, 44:21</p> <p><b>political</b> [1] - 85:14</p> <p><b>politicians</b> [2] - 12:12, 13:9</p> <p><b>Politico</b> [1] - 23:12</p> <p><b>Porter</b> [17] - 2:21, 2:22, 25:8, 25:9, 119:15, 121:2,</p>	<p>122:3, 124:5, 125:8, 126:2, 126:5, 127:13, 127:23, 127:25, 128:19, 129:17, 129:24</p> <p><b>porter</b> [2] - 120:23, 121:1</p> <p><b>Porter's</b> [4] - 117:24, 118:19, 119:11, 119:14</p> <p><b>portray</b> [1] - 136:11</p> <p><b>portraying</b> [1] - 142:16</p> <p><b>pose</b> [1] - 4:23</p> <p><b>position</b> [7] - 23:24, 24:6, 24:17, 98:18, 115:18, 131:23, 144:12</p> <p><b>positive</b> [1] - 14:3</p> <p><b>possible</b> [2] - 102:17, 108:3</p> <p><b>possibly</b> [2] - 36:8, 130:7</p> <p><b>Post</b> [1] - 29:18</p> <p><b>post</b> [2] - 68:22, 131:22</p> <p><b>posts</b> [3] - 23:2, 23:4, 23:6</p> <p><b>potential</b> [5] - 73:15, 73:18, 91:24, 93:2, 131:14</p> <p><b>potentially</b> [3] - 8:14, 18:25, 85:10</p> <p><b>power</b> [3] - 50:12, 50:14, 93:7</p> <p><b>PR</b> [1] - 60:13</p> <p><b>pre</b> [1] - 155:10</p> <p><b>pre-joining</b> [1] - 155:10</p> <p><b>preface</b> [1] - 134:20</p> <p><b>pregnancy</b> [4] - 59:23, 63:10, 72:2, 72:12</p> <p><b>pregnant</b> [9] - 33:4, 33:13, 34:2, 45:20, 49:4, 49:13, 49:23, 70:3, 70:24</p> <p><b>premium</b> [1] - 124:11</p> <p><b>present</b> [1] - 4:2</p> <p><b>presently</b> [1] - 6:19</p> <p><b>president</b> [2] - 22:1, 94:15</p> <p><b>PRESIDENT</b> [2] - 1:7, 161:8</p> <p><b>President</b> [43] - 7:14, 7:17, 7:23, 14:13, 14:15, 18:16, 18:20, 18:24, 18:25, 19:2, 19:11, 21:8, 22:12, 27:13, 27:25, 28:16, 29:9, 32:18, 47:19,</p>	<p>50:17, 50:18, 50:20, 66:8, 67:17, 77:12, 77:14, 80:15, 81:1, 81:2, 88:4, 88:14, 91:5, 94:2, 97:20, 103:16, 103:20, 128:9, 149:23, 154:3, 154:11, 154:13, 155:21</p> <p><b>presidential</b> [2] - 94:9, 132:22</p> <p><b>Press</b> [1] - 153:4</p> <p><b>press</b> [31] - 18:13, 23:1, 43:9, 48:1, 48:5, 76:18, 88:1, 88:3, 88:6, 88:7, 88:11, 90:24, 100:8, 100:15, 104:16, 106:16, 106:22, 107:5, 107:7, 109:4, 109:13, 113:12, 118:24, 130:11, 148:5, 148:8, 148:10, 148:12, 154:4</p> <p><b>prestigious</b> [1] - 127:10</p> <p><b>pretty</b> [13] - 4:19, 14:3, 16:24, 18:9, 20:2, 60:10, 60:20, 62:5, 70:1, 100:7, 113:5, 123:20, 155:25</p> <p><b>prevent</b> [1] - 140:16</p> <p><b>prevented</b> [1] - 138:5</p> <p><b>previous</b> [1] - 64:24</p> <p><b>PRIEBUS</b> [10] - 1:18, 2:12, 4:6, 157:8, 158:8, 159:14, 160:3, 160:19, 161:4, 161:10</p> <p><b>Priebus</b> [31] - 4:12, 6:9, 6:11, 30:17, 35:15, 35:22, 39:11, 39:20, 47:5, 52:15, 53:3, 58:4, 63:8, 69:22, 74:13, 96:20, 96:24, 106:11, 108:10, 109:25, 110:14, 118:5, 119:17, 134:21, 144:13, 145:2, 147:19, 152:14, 153:24, 155:15, 156:11</p> <p><b>primaries</b> [7] - 11:7, 12:6, 22:3, 22:8, 22:13, 87:13, 105:5</p> <p><b>primary</b> [11] - 11:18, 11:21, 12:7, 12:9, 12:22, 12:24, 13:10,</p>
---	--	---	--	--



<p>13:12, 13:24, 32:16, 79:7</p> <p><b>print</b> [1] - 154:7</p> <p><b>private</b> [1] - 136:22</p> <p><b>privately</b> [2] - 81:20, 148:9</p> <p><b>Privilege</b> [2] - 145:6, 145:7</p> <p><b>privilege</b> [7] - 58:11, 69:18, 69:20, 134:4, 144:24, 145:2, 146:9</p> <p><b>privileged</b> [7] - 57:21, 58:13, 143:21, 143:22, 144:20, 146:25, 147:1</p> <p><b>privity</b> [1] - 75:24</p> <p><b>PRO</b> [1] - 2:2</p> <p><b>pro</b> [6] - 13:24, 88:1, 88:22, 89:6, 90:1, 90:12</p> <p><b>pro-Trump</b> [6] - 13:24, 88:1, 88:22, 89:6, 90:1, 90:12</p> <p><b>probe</b> [1] - 59:17</p> <p><b>problem</b> [5] - 34:15, 35:13, 129:10, 153:21, 156:15</p> <p><b>problematic</b> [3] - 95:7, 99:5, 112:21</p> <p><b>problems</b> [1] - 97:24</p> <p><b>proceed</b> [1] - 161:17</p> <p><b>process</b> [15] - 11:12, 15:10, 54:25, 91:6, 94:16, 94:19, 94:23, 95:8, 111:4, 111:25, 112:10, 117:8, 117:9, 126:13, 130:19</p> <p><b>processed</b> [1] - 91:4</p> <p><b>produced</b> [3] - 35:1, 39:3, 51:13</p> <p><b>production</b> [5] - 35:2, 42:5, 42:12, 51:19, 52:5</p> <p><b>Professional</b> [3] - 1:21, 158:5, 158:22</p> <p><b>profile</b> [1] - 131:9</p> <p><b>prompted</b> [1] - 78:18</p> <p><b>pronounce</b> [1] - 96:8</p> <p><b>proper</b> [1] - 36:15</p> <p><b>proponent</b> [1] - 154:10</p> <p><b>prostitutes</b> [2] - 148:14, 148:22</p> <p><b>protected</b> [1] - 58:10</p> <p><b>provided</b> [1] - 63:21</p> <p><b>public</b> [6] - 96:25, 136:22, 146:10, 146:11, 148:1, 155:14</p>	<p><b>Public</b> [6] - 1:21, 27:20, 44:19, 45:2, 157:16, 159:23</p> <p><b>Public-State</b> [1] - 157:16</p> <p><b>publications</b> [1] - 119:21</p> <p><b>publicly</b> [3] - 87:23, 142:17, 148:4</p> <p><b>pulled</b> [1] - 139:22</p> <p><b>pundits</b> [2] - 13:22, 13:23</p> <p><b>purportedly</b> [1] - 138:24</p> <p><b>pursuant</b> [1] - 1:22</p> <p><b>Pursuant</b> [1] - 4:1</p> <p><b>pushback</b> [1] - 87:6</p> <p><b>pushed</b> [1] - 26:22</p> <p><b>put</b> [17] - 5:20, 6:2, 19:21, 31:9, 37:15, 37:17, 37:25, 47:25, 63:3, 76:13, 76:14, 80:5, 134:7, 134:9, 142:23, 145:5, 146:22</p> <p><b>putting</b> [3] - 37:22, 52:22, 110:23</p>	<p>39:19, 53:21, 66:15, 92:21, 103:17, 105:4, 130:21, 152:9</p> <p><b>quote-unquote</b> [1] - 130:21</p>	<p><b>reasoning</b> [1] - 24:15</p> <p><b>Reasons</b> [1] - 31:13</p> <p><b>reasons</b> [2] - 11:3, 128:21</p> <p><b>recapping</b> [1] - 39:18</p> <p><b>receive</b> [1] - 112:25</p> <p><b>received</b> [1] - 25:2</p> <p><b>receiving</b> [2] - 53:5, 86:1</p> <p><b>recent</b> [1] - 107:18</p> <p><b>recess</b> [2] - 63:6, 134:11</p> <p><b>recollection</b> [15] - 22:23, 40:12, 47:6, 56:6, 56:8, 57:1, 66:4, 66:11, 66:14, 67:6, 69:10, 69:12, 83:4, 116:15, 131:24</p> <p><b>record</b> [21] - 5:20, 31:7, 35:17, 35:18, 35:21, 36:6, 42:8, 44:18, 51:25, 52:18, 52:22, 81:22, 97:13, 110:14, 114:13, 114:20, 117:24, 134:13, 142:24, 155:20, 158:10</p> <p><b>Record</b> [1] - 161:24</p> <p><b>recording</b> [1] - 85:1</p> <p><b>records</b> [2] - 108:14, 111:7</p> <p><b>red</b> [1] - 74:16</p> <p><b>refer</b> [2] - 42:7, 149:3</p> <p><b>reference</b> [4] - 51:21, 78:9, 154:18, 161:10</p> <p><b>referenced</b> [8] - 17:10, 43:7, 44:10, 49:11, 73:14, 76:22, 78:19, 143:8</p> <p><b>references</b> [2] - 40:10, 43:8</p> <p><b>referencing</b> [6] - 35:2, 64:21, 77:6, 82:2, 98:1, 138:8</p> <p><b>referred</b> [5] - 67:7, 103:16, 105:4, 105:12, 105:13</p> <p><b>referring</b> [10] - 37:9, 43:18, 44:3, 47:8, 47:13, 54:1, 64:23, 65:2, 72:6, 78:6</p> <p><b>refers</b> [1] - 138:22</p> <p><b>Reform</b> [2] - 2:19, 97:2</p> <p><b>refresh</b> [8] - 40:12, 46:8, 46:13, 47:12, 116:15, 142:12, 142:18, 142:20</p> <p><b>refreshing</b> [1] - 47:5</p> <p><b>regard</b> [3] - 27:23,</p>	<p>68:11, 122:21</p> <p><b>regarding</b> [2] - 91:24, 154:22</p> <p><b>rehab</b> [1] - 102:15</p> <p><b>reign</b> [1] - 93:25</p> <p><b>Reince</b> [7] - 58:4, 85:23, 110:14, 143:20, 147:15, 152:13, 153:23</p> <p><b>REINCE</b> [10] - 1:18, 2:12, 4:6, 157:8, 158:8, 159:14, 160:3, 160:19, 161:4, 161:10</p> <p><b>Reinhold</b> [1] - 6:11</p> <p><b>reiterated</b> [1] - 41:19</p> <p><b>reiterating</b> [1] - 148:11</p> <p><b>rejected</b> [1] - 95:15</p> <p><b>related</b> [2] - 63:11, 78:17</p> <p><b>relationship</b> [1] - 71:23</p> <p><b>release</b> [2] - 91:10, 103:18</p> <p><b>released</b> [1] - 130:25</p> <p><b>relevant</b> [1] - 142:1</p> <p><b>relieved</b> [1] - 20:1</p> <p><b>remain</b> [2] - 7:16, 108:4</p> <p><b>remember</b> [88] - 14:7, 15:13, 16:10, 17:5, 17:16, 24:4, 24:21, 24:22, 25:13, 26:15, 26:24, 27:25, 28:16, 28:18, 29:13, 29:14, 30:8, 33:23, 33:25, 34:6, 38:24, 39:25, 40:7, 40:17, 40:22, 41:2, 41:12, 45:15, 47:14, 47:15, 47:24, 54:20, 55:17, 55:21, 57:5, 57:6, 57:7, 57:12, 64:11, 64:20, 66:9, 66:22, 66:24, 67:22, 67:24, 68:12, 68:13, 68:14, 69:9, 70:20, 70:21, 73:7, 74:5, 74:7, 75:9, 75:15, 77:23, 77:24, 77:25, 80:8, 80:12, 91:9, 91:12, 92:1, 98:19, 104:10, 104:19, 104:21, 105:7, 105:8, 105:19, 105:22, 105:24, 109:18, 114:14, 114:16, 114:17, 131:17, 131:20, 131:25, 135:7, 146:16,</p>
	<p><b>Q</b></p> <p><b>qualification</b> [2] - 20:13, 30:1</p> <p><b>qualifications</b> [12] - 27:1, 27:6, 27:10, 28:4, 28:9, 28:22, 28:24, 28:25, 29:3, 29:4, 29:11, 152:4</p> <p><b>qualified</b> [1] - 132:11</p> <p><b>qualifier</b> [2] - 80:1, 80:2</p> <p><b>QUESTION</b> [1] - 3:1</p> <p><b>questionable</b> [1] - 116:19</p> <p><b>questioned</b> [3] - 152:16, 153:16, 154:1</p> <p><b>questioning</b> [1] - 153:19</p> <p><b>questions</b> [5] - 4:21, 117:7, 156:2, 156:4, 156:14</p> <p><b>quick</b> [1] - 35:12</p> <p><b>quickly</b> [2] - 39:3, 113:5</p> <p><b>quietly</b> [1] - 140:4</p> <p><b>quite</b> [5] - 17:16, 37:8, 42:11, 45:5, 87:22</p> <p><b>quotation</b> [1] - 36:21</p> <p><b>quote</b> [12] - 20:11, 29:8, 29:18, 29:25,</p>	<p><b>R</b></p> <p><b>race</b> [1] - 12:1</p> <p><b>raise</b> [2] - 53:24, 146:23</p> <p><b>raised</b> [2] - 22:7, 65:24</p> <p><b>raising</b> [6] - 11:10, 20:16, 20:21, 21:18, 21:21, 21:23</p> <p><b>Raj</b> [3] - 90:20, 99:8, 111:6</p> <p><b>range</b> [1] - 97:21</p> <p><b>ranking</b> [1] - 93:5</p> <p><b>ranks</b> [2] - 87:12, 118:4</p> <p><b>rather</b> [5] - 52:5, 53:18, 61:24, 81:23, 83:20</p> <p><b>RE</b> [1] - 161:8</p> <p><b>read</b> [34] - 7:1, 10:1, 19:19, 34:24, 35:25, 36:1, 36:5, 36:12, 36:22, 38:11, 42:17, 51:20, 51:24, 52:16, 53:17, 97:12, 97:13, 110:3, 117:24, 135:20, 137:12, 147:11, 147:12, 148:13, 148:20, 148:23, 149:2, 149:8, 153:14, 153:15, 153:21, 156:8, 159:6, 160:4</p> <p><b>reading</b> [3] - 35:4, 84:19, 161:16</p> <p><b>ready</b> [3] - 6:5, 19:22, 134:5</p> <p><b>real</b> [1] - 99:5</p> <p><b>realistic</b> [3] - 71:3, 71:10, 71:15</p> <p><b>realize</b> [1] - 130:25</p> <p><b>really</b> [10] - 11:2, 12:2, 19:20, 23:23, 27:3, 44:11, 53:6, 108:24, 143:14, 146:25</p> <p><b>reason</b> [21] - 5:24, 26:2, 26:20, 26:21, 26:22, 29:22, 35:9, 38:13, 38:14, 40:2, 76:16, 92:11, 101:1, 101:3, 128:3, 128:15, 129:13, 130:12, 132:10, 142:17, 150:9</p>		



<p>151:17, 151:20, 151:24, 152:18</p> <p><b>Remember</b> [2] - 139:12, 141:6</p> <p><b>remind</b> [1] - 32:8</p> <p><b>Remote</b> [1] - 1:12</p> <p><b>remotely</b> [1] - 125:25</p> <p><b>remove</b> [1] - 136:4</p> <p><b>removed</b> [5] - 36:10, 36:20, 37:1, 37:3, 53:21</p> <p><b>Renewal</b> [1] - 44:23</p> <p><b>repeat</b> [5] - 45:23, 73:3, 92:8, 147:3, 147:6</p> <p><b>repeatedly</b> [1] - 76:22</p> <p><b>rephrase</b> [8] - 4:24, 8:18, 12:20, 12:21, 63:14, 110:12, 120:5</p> <p><b>report</b> [4] - 45:8, 45:13, 77:13, 158:7</p> <p><b>reported</b> [7] - 23:23, 45:10, 46:10, 90:20, 125:8, 131:3, 148:6</p> <p><b>Reporter</b> [4] - 1:21, 42:2, 158:6, 158:22</p> <p><b>reporter</b> [25] - 5:17, 39:4, 52:12, 96:12, 96:21, 97:7, 119:4, 135:13, 135:21, 135:25, 138:6, 138:7, 138:8, 138:9, 138:21, 139:5, 139:22, 140:7, 140:20, 143:3, 147:6, 147:8, 147:9, 147:11</p> <p><b>REPORTER</b> [1] - 158:1</p> <p><b>reporter's</b> [1] - 5:22</p> <p><b>reporters</b> [1] - 154:5</p> <p><b>reports</b> [20] - 8:7, 21:25, 22:5, 22:24, 23:9, 23:10, 23:11, 48:5, 79:12, 79:13, 79:14, 95:6, 95:7, 103:17, 103:19, 103:21, 121:13, 148:20, 149:2, 149:8</p> <p><b>representation</b> [4] - 10:7, 10:8, 10:25, 31:21</p> <p><b>represented</b> [3] - 10:13, 36:25, 68:17</p> <p><b>representing</b> [8] - 10:6, 57:22, 57:23, 57:25, 58:4, 69:21, 137:19, 137:20</p> <p><b>Republican</b> [6] - 8:2, 8:14, 9:7, 11:8,</p>	<p>11:16, 12:10</p> <p><b>request</b> [5] - 86:22, 87:2, 126:18, 142:13, 145:10</p> <p><b>requested</b> [1] - 147:13</p> <p><b>requesting</b> [2] - 144:1, 144:3</p> <p><b>requests</b> [1] - 91:24</p> <p><b>rescheduled</b> [2] - 156:12, 156:13</p> <p><b>research</b> [5] - 85:22, 90:22, 104:6, 104:11, 104:17</p> <p><b>resembles</b> [1] - 38:1</p> <p><b>resending</b> [1] - 31:2</p> <p><b>resignation</b> [3] - 152:10, 152:12, 153:22</p> <p><b>resigns</b> [1] - 153:3</p> <p><b>resistant</b> [1] - 87:22</p> <p><b>resisting</b> [1] - 114:21</p> <p><b>resolved</b> [4] - 98:16, 98:23, 122:13, 122:14</p> <p><b>responsible</b> [1] - 14:23</p> <p><b>rest</b> [1] - 12:4</p> <p><b>restate</b> [1] - 133:4</p> <p><b>restraining</b> [2] - 122:4, 122:7</p> <p><b>restroom</b> [2] - 4:25, 62:23</p> <p><b>result</b> [3] - 110:21, 112:3, 146:17</p> <p><b>results</b> [1] - 112:2</p> <p><b>resumes</b> [2] - 93:13, 93:15</p> <p><b>resumé</b> [1] - 93:6</p> <p><b>retained</b> [1] - 58:12</p> <p><b>retract</b> [1] - 57:10</p> <p><b>reveal</b> [1] - 49:4</p> <p><b>revelation</b> [1] - 87:15</p> <p><b>review</b> [11] - 39:23, 41:5, 41:8, 55:8, 55:9, 95:3, 101:22, 112:4, 112:9, 113:2, 113:4</p> <p><b>reviewed</b> [3] - 112:7, 115:8, 125:23</p> <p><b>reviewing</b> [1] - 109:1</p> <p><b>reviews</b> [3] - 112:19, 121:8, 121:9</p> <p><b>revoked</b> [4] - 73:15, 73:16, 73:17, 73:19</p> <p><b>revoking</b> [1] - 50:3</p> <p><b>Rex</b> [1] - 83:25</p> <p><b>Richard</b> [1] - 6:11</p> <p><b>Rick</b> [4] - 17:6, 17:12, 17:13, 18:3</p> <p><b>ride</b> [1] - 150:11</p>	<p><b>ring</b> [14] - 56:3, 83:7, 84:24, 98:6, 105:3, 109:17, 114:8, 131:9, 131:10, 131:15, 132:2, 148:16, 150:1, 151:22</p> <p><b>rings</b> [5] - 83:8, 131:5, 132:3, 150:2, 150:3</p> <p><b>rise</b> [1] - 118:4</p> <p><b>RNC</b> [34] - 10:15, 10:18, 20:6, 20:16, 21:18, 21:20, 21:23, 24:12, 24:19, 86:5, 86:17, 87:7, 87:8, 87:9, 87:12, 87:20, 87:21, 88:1, 88:11, 88:21, 89:6, 89:12, 89:20, 90:2, 90:13, 90:22, 99:12, 104:6, 104:12, 105:6, 151:8, 152:14, 153:24, 154:16</p> <p><b>road</b> [1] - 79:6</p> <p><b>Rob</b> [15] - 2:21, 2:22, 25:8, 117:24, 118:19, 119:11, 119:13, 122:3, 125:7, 126:2, 126:5, 127:24, 128:18, 129:17, 129:23</p> <p><b>rob</b> [2] - 25:9, 119:15</p> <p><b>Robaina</b> [3] - 1:20, 158:5, 158:21</p> <p><b>ROBAINA</b> [2] - 157:16, 161:21</p> <p><b>ROCCA</b> [1] - 2:5</p> <p><b>role</b> [43] - 7:4, 11:6, 14:11, 15:4, 15:11, 16:1, 17:13, 17:16, 20:24, 21:11, 21:13, 28:2, 29:1, 29:10, 29:21, 43:21, 44:25, 45:4, 45:13, 50:11, 55:15, 55:20, 56:3, 56:6, 59:7, 59:9, 80:10, 80:13, 89:17, 89:20, 89:25, 100:7, 100:11, 100:13, 100:15, 100:16, 100:18, 104:6, 104:12, 106:12, 109:13, 116:2, 127:11</p> <p><b>roles</b> [7] - 25:21, 43:15, 43:20, 44:11, 44:21, 44:22, 45:12</p> <p><b>Romney</b> [1] - 12:3</p> <p><b>ROSEN</b> [1] - 2:5</p> <p><b>Rudy</b> [1] - 26:13</p>	<p><b>Rudy's</b> [4] - 27:18, 28:8, 29:6, 29:9</p> <p><b>rule</b> [1] - 6:2</p> <p><b>rules</b> [1] - 4:16</p> <p><b>rumors</b> [1] - 78:12</p> <p><b>running</b> [13] - 8:7, 8:14, 8:20, 8:22, 9:5, 9:18, 9:22, 11:10, 13:3, 14:13, 37:14, 132:1</p> <p><b>runs</b> [1] - 131:12</p>	<p><b>48:21, 49:18, 55:3, 55:4, 55:23, 60:8, 62:12, 74:6, 74:24, 76:13, 77:6, 77:14, 90:25, 91:1, 92:20, 104:1, 107:14, 107:16, 113:15, 113:18, 115:16, 116:3, 128:22, 135:4, 152:10, 153:3, 154:3, 154:10, 154:12</b></p> <p><b>Sean's</b> [3] - 75:6, 76:17, 77:1</p> <p><b>Sebastian</b> [1] - 149:22</p> <p><b>second</b> [11] - 31:1, 96:9, 102:18, 102:20, 102:21, 102:23, 102:24, 103:2, 106:9, 138:21, 139:1</p> <p><b>seconds</b> [2] - 39:7, 156:5</p> <p><b>secret</b> [2] - 117:25, 131:8</p> <p><b>secretary</b> [10] - 25:9, 90:24, 100:8, 100:15, 106:16, 106:22, 107:8, 109:5, 131:24, 154:4</p> <p><b>Secretary</b> [1] - 153:4</p> <p><b>securing</b> [1] - 89:4</p> <p><b>security</b> [38] - 94:19, 95:9, 97:5, 98:10, 98:14, 98:25, 99:3, 106:2, 108:7, 108:12, 111:3, 111:22, 112:1, 112:9, 115:14, 115:17, 116:9, 120:16, 122:11, 123:19, 125:13, 125:15, 125:19, 125:21, 126:8, 126:16, 126:21, 127:12, 128:13, 128:18, 129:15, 129:23, 130:13, 130:15, 130:22, 130:25, 150:4, 151:22</p> <p><b>see</b> [44] - 18:12, 26:12, 30:12, 30:13, 30:17, 30:21, 30:22, 31:3, 35:7, 36:3, 38:23, 39:11, 40:15, 52:8, 52:17, 53:19, 53:23, 72:22, 91:5, 91:19, 96:8, 97:10, 97:11, 100:1, 100:17,</p>
---	--	--	---	--



102:21, 106:9, 117:23, 118:13, 128:11, 135:13, 136:7, 137:17, 138:9, 140:6, 140:19, 141:15, 141:16, 144:19, 146:2, 147:18, 151:14, 156:6 <b>seeing</b> [3] - 38:24, 41:3, 148:25 <b>seek</b> [1] - 80:16 <b>seeking</b> [1] - 144:21 <b>seem</b> [2] - 71:19 <b>segued</b> [1] - 91:20 <b>segues</b> [1] - 11:5 <b>select</b> [2] - 15:16, 17:11 <b>Selecting</b> [1] - 15:6 <b>selection</b> [2] - 14:17, 21:10 <b>seller</b> [1] - 84:24 <b>selling</b> [1] - 109:16 <b>senator</b> [1] - 32:16 <b>Senator</b> [1] - 25:10 <b>senators</b> [1] - 30:9 <b>send</b> [6] - 51:17, 96:12, 107:8, 143:2, 152:6, 153:1 <b>sending</b> [3] - 52:11, 52:12, 117:16 <b>senior</b> [16] - 14:18, 15:7, 25:21, 44:10, 61:2, 80:9, 85:19, 85:25, 97:17, 100:7, 100:11, 100:13, 100:15, 100:16, 100:18, 106:12 <b>sense</b> [3] - 57:22, 60:22, 127:5 <b>sent</b> [14] - 39:7, 45:21, 45:24, 48:12, 48:22, 51:10, 65:5, 66:5, 93:5, 93:10, 93:12, 119:5, 135:12, 143:6 <b>sentence</b> [1] - 53:19 <b>separate</b> [1] - 118:14 <b>serious</b> [3] - 59:23, 59:24, 97:21 <b>serve</b> [4] - 47:19, 71:12, 103:21, 116:22 <b>served</b> [4] - 7:6, 24:7, 114:10, 131:3 <b>serving</b> [4] - 83:17, 103:16, 116:16, 155:21 <b>Sessions</b> [5] - 29:20, 30:6, 32:6, 32:7, 32:15	<b>set</b> [4] - 68:23, 158:14, 158:16, 159:9 <b>setup</b> [1] - 22:20 <b>seven</b> [3] - 6:20, 121:4, 123:2 <b>seven-month</b> [1] - 123:2 <b>several</b> [5] - 6:23, 20:15, 95:18, 155:15, 156:13 <b>sexual</b> [2] - 148:16, 149:5 <b>sexually</b> [1] - 128:6 <b>SF</b> [2] - 94:25, 100:3 <b>Shah</b> [7] - 90:21, 99:8, 99:17, 100:20, 101:2, 103:13, 111:6 <b>Shah's</b> [2] - 103:4, 104:3 <b>shall</b> [2] - 161:16, 161:17 <b>share</b> [6] - 31:10, 35:6, 39:5, 43:3, 134:3, 134:17 <b>shared</b> [2] - 50:12, 50:19 <b>sharing</b> [3] - 30:14, 52:13, 120:21 <b>Sharing</b> [10] - 31:11, 35:19, 39:9, 96:16, 106:7, 109:23, 117:19, 119:9, 135:10, 138:19 <b>SHEET</b> [1] - 160:1 <b>shock</b> [1] - 121:11 <b>shook</b> [1] - 55:22 <b>shop</b> [5] - 39:21, 45:17, 104:13, 107:16, 113:13 <b>Short</b> [1] - 17:3 <b>short</b> [1] - 95:16 <b>shortage</b> [1] - 25:6 <b>SHORTHAND</b> [1] - 158:1 <b>Shorthand</b> [1] - 158:6 <b>shortly</b> [1] - 47:10 <b>shouting</b> [1] - 77:24 <b>show</b> [21] - 23:16, 34:21, 34:23, 35:15, 42:10, 51:14, 77:16, 95:23, 105:11, 106:2, 109:19, 116:14, 116:25, 125:5, 133:20, 135:9, 137:10, 138:12, 141:21, 142:11, 155:4 <b>showed</b> [5] - 32:5, 32:7, 102:15, 118:8, 142:17	<b>showing</b> [4] - 35:22, 42:3, 141:23, 142:3 <b>shown</b> [1] - 130:21 <b>side</b> [1] - 47:22 <b>sideways</b> [1] - 136:1 <b>Sifakis</b> [1] - 45:11 <b>sign</b> [1] - 94:3 <b>sign-off</b> [1] - 94:3 <b>signature</b> [1] - 161:12 <b>signed</b> [2] - 82:10, 82:12 <b>Signed</b> [1] - 160:21 <b>signing</b> [1] - 161:17 <b>siloed</b> [1] - 18:10 <b>similar</b> [2] - 119:20, 148:25 <b>simply</b> [1] - 81:7 <b>simply</b> [2] - 92:12, 142:11 <b>Sims</b> [1] - 150:20 <b>simultaneously</b> [1] - 71:13 <b>since..</b> [1] - 36:2 <b>Sincerely</b> [1] - 161:19 <b>Sinclair</b> [2] - 83:6, 84:18 <b>single</b> [1] - 40:6 <b>sit</b> [8] - 33:24, 34:1, 34:6, 39:23, 41:5, 41:14, 67:25, 75:3 <b>sitting</b> [2] - 78:2, 79:11 <b>situation</b> [13] - 24:24, 49:6, 50:25, 72:21, 74:17, 75:18, 75:23, 101:8, 101:22, 102:7, 102:13, 125:8, 146:8 <b>six</b> [1] - 15:12 <b>skepticism</b> [2] - 152:15, 153:25 <b>Slate</b> [2] - 2:21, 117:21 <b>slots</b> [1] - 19:18 <b>slow</b> [3] - 114:18, 125:5, 153:2 <b>small</b> [2] - 52:7, 61:24 <b>smart</b> [1] - 93:16 <b>Smoking</b> [1] - 2:20 <b>smoking</b> [1] - 154:22 <b>snuck</b> [1] - 127:12 <b>so..</b> [2] - 54:12, 65:3 <b>soft</b> [1] - 73:20 <b>someone</b> [28] - 17:11, 19:3, 20:24, 48:14, 60:3, 60:6, 60:18, 61:1, 74:14, 75:10, 83:14, 101:5, 101:14, 102:13, 105:13, 107:18,	112:20, 112:21, 115:14, 123:10, 123:20, 128:14, 128:18, 131:3, 131:7, 132:4, 154:8, 155:20 <b>Someone</b> [1] - 134:24 <b>sometime</b> [1] - 120:7 <b>sometimes</b> [7] - 9:22, 9:23, 113:1, 113:3, 113:4, 121:24, 127:8 <b>somewhere</b> [4] - 7:2, 84:22, 131:24, 135:8 <b>son</b> [4] - 26:13, 27:18, 29:7, 29:9 <b>son's</b> [2] - 5:4, 28:8 <b>sorry</b> [28] - 23:7, 25:20, 25:24, 27:4, 28:1, 33:7, 34:4, 45:23, 46:18, 46:19, 46:21, 51:23, 52:21, 55:16, 56:15, 64:8, 76:20, 96:22, 106:10, 117:17, 122:16, 137:19, 144:8, 144:17, 145:7, 147:2, 147:4, 152:23 <b>sort</b> [10] - 7:4, 16:17, 17:15, 18:6, 21:13, 50:12, 50:18, 64:6, 142:12, 145:5 <b>sorts</b> [2] - 149:1, 149:9 <b>sought</b> [2] - 76:25 <b>sound</b> [4] - 46:15, 56:7, 148:25, 152:21 <b>sounded</b> [1] - 37:18 <b>Sounds</b> [1] - 62:25 <b>sounds</b> [1] - 38:6 <b>SOUTHERN</b> [1] - 1:1 <b>SP</b> [2] - 129:5, 147:21 <b>Spanish</b> [2] - 61:3, 139:17 <b>spare</b> [1] - 125:4 <b>speaking</b> [5] - 36:6, 69:10, 85:4, 138:5, 154:20 <b>speaks</b> [1] - 98:7 <b>special</b> [4] - 18:15, 111:12, 149:22, 155:21 <b>specific</b> [5] - 44:12, 125:22, 126:12, 126:14 <b>specifically</b> [7] - 17:20, 67:22, 68:12, 74:7, 76:24, 90:20, 121:23 <b>speed</b> [3] - 74:3,	134:6, 152:7 <b>spell</b> [2] - 104:25, 150:15 <b>spent</b> [2] - 20:23, 154:14 <b>spicer</b> [4] - 92:12, 128:16, 152:15, 153:25 <b>Spicer</b> [12] - 19:13, 36:17, 43:13, 46:25, 60:9, 67:7, 74:24, 107:14, 107:16, 111:10, 115:16, 153:3 <b>spicer's</b> [3] - 153:11, 153:17, 153:22 <b>Spicer's</b> [2] - 10:2, 152:10 <b>spoken</b> [1] - 139:17 <b>sporting</b> [1] - 27:22 <b>sports</b> [3] - 27:22, 27:23, 28:6 <b>spot</b> [1] - 36:11 <b>spots</b> [1] - 19:21 <b>SS</b> [2] - 158:2, 159:2 <b>St</b> [1] - 2:6 <b>staff</b> [31] - 14:5, 14:11, 14:20, 14:23, 15:4, 15:5, 15:20, 15:23, 16:1, 16:7, 17:8, 17:9, 20:25, 21:12, 21:14, 21:20, 21:22, 24:12, 25:9, 28:21, 32:19, 60:4, 76:14, 107:4, 108:21, 109:9, 110:18, 111:16, 118:3, 125:18, 129:24 <b>Staff</b> [2] - 152:13, 153:23 <b>staffers</b> [1] - 15:7 <b>stamp</b> [8] - 42:1, 42:4, 42:5, 42:7, 42:10, 51:25, 52:7, 52:22 <b>stamped</b> [2] - 51:17, 51:18 <b>standard</b> [3] - 4:16, 128:23, 129:7 <b>standing</b> [1] - 49:1 <b>standpoint</b> [1] - 25:6 <b>start</b> [4] - 6:5, 71:25, 96:22 <b>started</b> [5] - 20:2, 98:2, 98:4, 105:24, 120:16 <b>starting</b> [1] - 97:14 <b>starts</b> [2] - 36:2, 97:9 <b>STATE</b> [3] - 157:3, 158:2, 159:2 <b>State</b> [3] - 1:22, 4:3,
---	--	--	---	---





<p>157:16  <b>state</b> [6] - 6:8, 9:6, 9:19, 44:18, 108:6, 155:11  <b>statement</b> [2] - 32:25, 80:5  <b>statements</b> [1] - 79:14  <b>STATES</b> [1] - 1:1  <b>States</b> [1] - 32:16  <b>status</b> [1] - 108:8  <b>Stellar</b> [1] - 104:4  <b>STENOGRAPHER</b> [11] - 42:13, 42:16, 42:19, 43:2, 43:5, 46:18, 56:15, 56:21, 134:12, 134:16, 147:10  <b>stenographic</b> [1] - 158:10  <b>stenographically</b> [1] - 158:7  <b>step</b> [3] - 56:2, 126:14  <b>step-by-step</b> [1] - 126:14  <b>Stephanie</b> [2] - 105:22, 111:6  <b>Stephen</b> [1] - 19:12  <b>stepped</b> [6] - 57:4, 57:5, 57:8, 57:13, 135:20, 138:5  <b>steps</b> [1] - 122:10  <b>Steve</b> [16] - 13:25, 15:25, 16:8, 17:1, 21:5, 21:6, 45:11, 46:3, 46:11, 47:18, 47:21, 50:10, 50:12, 50:13, 86:10, 88:14  <b>Steven</b> [1] - 150:18  <b>still</b> [7] - 36:7, 55:5, 56:17, 74:20, 112:6, 112:13, 118:3  <b>stipulation</b> [1] - 4:1  <b>stirred</b> [1] - 105:9  <b>stop</b> [4] - 43:3, 57:3, 58:20, 106:10  <b>stories</b> [2] - 136:11, 148:5  <b>story</b> [2] - 119:22, 120:7  <b>straight</b> [1] - 136:2  <b>strains</b> [1] - 123:17  <b>street</b> [2] - 105:4, 105:14  <b>Street</b> [1] - 125:7  <b>stress</b> [1] - 22:22  <b>stretch</b> [1] - 123:18  <b>strictly</b> [1] - 78:5  <b>strip</b> [1] - 48:5  <b>structure</b> [2] - 40:18, 41:15</p>	<p><b>studied</b> [1] - 33:2  <b>study</b> [1] - 37:8  <b>stuff</b> [3] - 113:6, 129:2, 129:5  <b>styled</b> [1] - 161:11  <b>subject</b> [8] - 55:8, 81:17, 110:24, 112:9, 116:20, 143:14, 143:18, 146:9  <b>subjected</b> [1] - 113:1  <b>submitted</b> [1] - 99:21  <b>subordinate</b> [1] - 71:24  <b>subscribed</b> [1] - 159:17  <b>subsequent</b> [1] - 22:9  <b>success</b> [3] - 85:2, 85:5, 85:8  <b>successful</b> [1] - 85:9  <b>sudden</b> [1] - 140:2  <b>suggest</b> [1] - 161:14  <b>suggesting</b> [2] - 67:15, 81:3  <b>suggestion</b> [2] - 54:18, 54:21  <b>suing</b> [1] - 144:24  <b>suitable</b> [2] - 24:25, 161:15  <b>super</b> [1] - 90:12  <b>support</b> [1] - 89:20  <b>supporter</b> [5] - 7:23, 29:23, 29:25, 31:24, 32:13  <b>supportive</b> [4] - 22:1, 22:11, 87:11, 87:12  <b>suppose</b> [2] - 84:13, 127:15  <b>surprised</b> [4] - 49:5, 68:9, 93:17, 105:6  <b>surrogate</b> [1] - 113:14  <b>susceptible</b> [2] - 95:25, 131:7  <b>Susie</b> [1] - 131:12  <b>SW</b> [1] - 2:3  <b>sworn</b> [3] - 4:8, 157:9, 158:12  <b>Sworn</b> [1] - 159:17  <b>synopsis</b> [1] - 135:19</p>	<p>68:18, 94:14  <b>teams</b> [4] - 37:17, 110:23, 111:16  <b>technical</b> [1] - 35:12  <b>telephone</b> [2] - 65:13, 161:14  <b>television</b> [4] - 79:17, 79:21, 80:10, 80:11  <b>tell-all</b> [2] - 84:25, 85:6  <b>temporary</b> [2] - 126:16, 150:4  <b>ten</b> [3] - 14:8, 17:6, 62:22  <b>tenure</b> [5] - 33:10, 98:3, 120:24, 121:4, 123:2  <b>term</b> [2] - 40:10, 130:21  <b>terms</b> [3] - 7:16, 18:13, 53:25  <b>terrible</b> [1] - 101:13  <b>testified</b> [4] - 4:8, 37:12, 37:16, 130:5  <b>testimony</b> [4] - 49:2, 78:2, 97:3, 128:15  <b>thanking</b> [2] - 139:7, 140:25  <b>that..</b> [1] - 97:10  <b>themed</b> [2] - 148:15, 149:4  <b>themselves</b> [1] - 115:7  <b>then..</b> [1] - 52:9  <b>thereafter</b> [1] - 83:5  <b>thereof</b> [2] - 63:11, 74:23  <b>Thereupon</b> [13] - 4:5, 42:21, 42:23, 56:22, 96:17, 106:5, 109:21, 117:13, 119:7, 120:19, 143:9, 147:12, 156:19  <b>thereupon</b> [1] - 134:14  <b>thick</b> [1] - 13:21  <b>thinking</b> [5] - 11:18, 12:17, 82:14, 144:24, 152:2  <b>thinks</b> [1] - 72:6  <b>third</b> [1] - 119:5  <b>thoughts</b> [1] - 132:6  <b>thousand</b> [1] - 26:18  <b>thousands</b> [4] - 132:8, 132:21, 132:22, 133:2  <b>three</b> [6] - 22:16, 22:17, 23:18, 48:24, 84:16, 117:15  <b>thrilled</b> [1] - 83:25  <b>throughout</b> [3] -</p>	<p>12:24, 13:12, 97:19  <b>throw</b> [3] - 30:10, 30:11, 119:4  <b>Thrush</b> [1] - 153:5  <b>thumbs</b> [1] - 113:5  <b>Tillerson</b> [1] - 83:25  <b>TIME</b> [1] - 1:14  <b>timeline</b> [2] - 32:23, 33:8  <b>timing</b> [1] - 9:4  <b>title</b> [3] - 104:10, 107:11, 155:6  <b>titles</b> [1] - 18:15  <b>TO</b> [2] - 3:1, 161:4  <b>today</b> [7] - 4:1, 10:5, 49:1, 67:25, 75:4, 78:2, 102:16  <b>together</b> [11] - 19:21, 20:23, 37:17, 37:23, 37:25, 76:14, 76:15, 88:13, 88:16, 110:23, 111:15  <b>took</b> [9] - 70:12, 94:9, 95:8, 95:12, 95:13, 125:13, 142:2, 142:3, 161:18  <b>top</b> [8] - 15:5, 15:15, 18:22, 19:17, 19:20, 23:24, 45:18  <b>topic</b> [2] - 34:16, 34:17  <b>total</b> [1] - 48:11  <b>totally</b> [1] - 32:15  <b>towards</b> [2] - 12:23, 141:9  <b>Tower</b> [2] - 78:8, 154:14  <b>track</b> [2] - 88:19, 91:20  <b>traditional</b> [1] - 16:1  <b>traditionally</b> [1] - 14:12  <b>transcribed</b> [1] - 161:12  <b>transcript</b> [6] - 34:21, 158:9, 159:7, 160:4, 161:12, 161:18  <b>Transcript</b> [1] - 2:16  <b>transition</b> [29] - 10:18, 15:21, 16:23, 16:25, 17:1, 17:2, 17:3, 17:4, 17:15, 17:18, 19:24, 20:1, 21:7, 40:24, 57:24, 58:2, 58:14, 61:1, 61:16, 61:19, 61:23, 61:24, 62:3, 62:6, 62:8, 66:2, 68:18, 94:14, 135:3  <b>transitioned</b> [1] - 151:10</p>	<p><b>treated</b> [5] - 13:4, 84:9, 129:14, 130:13, 130:16  <b>Tricia</b> [3] - 96:7, 96:9, 97:3  <b>tricky</b> [1] - 34:22  <b>tried</b> [1] - 110:17  <b>tries</b> [1] - 132:23  <b>true</b> [12] - 7:20, 70:3, 70:5, 90:4, 90:5, 108:25, 129:25, 132:16, 148:24, 149:10, 158:10, 159:8  <b>Trump</b> [107] - 6:20, 6:22, 6:24, 7:3, 7:17, 7:23, 9:11, 10:5, 10:14, 12:25, 13:5, 13:17, 13:24, 20:6, 22:2, 22:9, 22:10, 25:1, 25:14, 26:21, 29:19, 29:21, 30:7, 30:18, 31:14, 32:7, 33:9, 33:11, 61:4, 63:8, 63:16, 63:22, 63:23, 65:25, 67:5, 67:10, 72:13, 78:8, 79:14, 79:15, 79:16, 79:24, 79:25, 80:6, 80:11, 80:15, 84:3, 84:5, 84:10, 87:11, 87:12, 87:21, 87:25, 88:1, 88:22, 89:3, 89:4, 89:6, 89:14, 90:1, 90:11, 90:12, 91:7, 91:15, 93:21, 105:4, 105:12, 105:14, 108:16, 110:18, 121:1, 124:2, 124:8, 124:11, 124:21, 127:17, 127:19, 127:20, 128:4, 132:5, 132:18, 132:19, 133:5, 133:6, 135:20, 135:24, 136:15, 137:22, 137:24, 137:25, 138:5, 139:6, 140:5, 140:20, 142:14, 142:15, 152:16, 153:10, 153:16, 154:1, 154:13, 154:14  <b>TRUMP</b> [2] - 1:7, 161:8  <b>Trump's</b> [3] - 124:24, 131:18, 155:7  <b>trust</b> [1] - 82:13</p>
	<p><b>T</b></p>			
	<p><b>table</b> [1] - 146:12  <b>talks</b> [1] - 117:22  <b>tape</b> [2] - 87:15, 91:11  <b>team</b> [15] - 15:21, 19:4, 19:6, 36:16, 37:23, 58:14, 61:1, 61:17, 61:19, 61:23, 61:24, 62:3, 62:9,</p>			



<p><b>truthful</b> <sup>[1]</sup> - 5:9</p> <p><b>try</b> <sup>[4]</sup> - 4:23, 5:17, 93:14, 111:15</p> <p><b>trying</b> <sup>[10]</sup> - 19:9, 23:17, 35:8, 47:7, 65:1, 66:22, 77:4, 88:16, 90:7, 118:13</p> <p><b>turned</b> <sup>[2]</sup> - 50:5, 130:17</p> <p><b>turnover</b> <sup>[1]</sup> - 44:1</p> <p><b>TV</b> <sup>[6]</sup> - 79:25, 80:14, 81:1, 81:4, 155:7</p> <p><b>tweet</b> <sup>[1]</sup> - 69:4</p> <p><b>tweets</b> <sup>[18]</sup> - 45:21, 45:25, 46:2, 48:12, 48:22, 49:6, 49:8, 51:6, 59:1, 59:22, 67:8, 68:5, 68:11, 68:22, 68:23, 69:14, 74:13, 75:22</p> <p><b>twice</b> <sup>[1]</sup> - 154:15</p> <p><b>two</b> <sup>[29]</sup> - 8:13, 8:20, 9:3, 16:15, 20:11, 20:13, 21:14, 21:22, 23:15, 26:12, 28:17, 45:17, 57:7, 57:9, 60:3, 79:3, 81:10, 81:11, 83:4, 83:9, 88:12, 97:17, 107:18, 119:2, 119:23, 123:18, 123:21, 130:20, 155:15</p> <p><b>Two</b> <sup>[1]</sup> - 155:11</p> <p><b>type</b> <sup>[5]</sup> - 9:6, 9:7, 67:4, 84:13, 131:22</p> <p><b>typical</b> <sup>[3]</sup> - 61:22, 62:4, 62:5</p>	<p>34:19, 67:1, 89:22, 145:8</p> <p><b>unique</b> <sup>[3]</sup> - 50:11, 62:5, 111:12</p> <p><b>UNITED</b> <sup>[1]</sup> - 1:1</p> <p><b>United</b> <sup>[1]</sup> - 32:16</p> <p><b>University</b> <sup>[2]</sup> - 124:16, 124:22</p> <p><b>unless</b> <sup>[3]</sup> - 62:20, 144:24, 146:2</p> <p><b>unquote</b> <sup>[2]</sup> - 39:24, 130:21</p> <p><b>unto</b> <sup>[1]</sup> - 158:16</p> <p><b>untrue</b> <sup>[2]</sup> - 136:22, 137:8</p> <p><b>unusual</b> <sup>[1]</sup> - 16:8</p> <p><b>up</b> <sup>[6]</sup> - 5:6, 12:5, 20:16, 29:17, 30:10, 30:11, 30:25, 31:9, 36:10, 36:17, 40:3, 40:5, 47:17, 48:6, 56:17, 57:15, 58:15, 59:16, 61:14, 64:16, 66:10, 67:5, 67:15, 74:1, 74:3, 74:9, 74:12, 75:5, 75:16, 75:19, 76:20, 85:10, 86:23, 94:15, 94:18, 94:23, 98:15, 100:19, 101:21, 103:19, 104:11, 112:3, 112:25, 114:1, 115:12, 115:19, 118:8, 118:13, 119:4, 119:12, 123:20, 126:3, 132:13, 132:23, 133:18, 137:11, 144:22, 145:16, 146:1, 152:7</p> <p><b>update</b> <sup>[1]</sup> - 41:14</p> <p><b>updated</b> <sup>[1]</sup> - 59:3</p> <p><b>updating</b> <sup>[1]</sup> - 41:13</p> <p><b>upset</b> <sup>[1]</sup> - 136:15</p>	<p><b>vett</b> <sup>[1]</sup> - 115:5</p> <p><b>vetting</b> <sup>[17]</sup> - 101:25, 107:20, 107:24, 107:25, 108:4, 108:13, 111:3, 111:10, 111:22, 111:25, 112:1, 112:9, 112:19, 114:24, 115:1, 115:11, 155:22</p> <p><b>vettings</b> <sup>[1]</sup> - 116:23</p> <p><b>VIA</b> <sup>[1]</sup> - 2:1</p> <p><b>via</b> <sup>[1]</sup> - 144:14</p> <p><b>vice</b> <sup>[1]</sup> - 94:15</p> <p><b>victim</b> <sup>[1]</sup> - 119:14</p> <p><b>Video</b> <sup>[1]</sup> - 1:12</p> <p><b>video</b> <sup>[5]</sup> - 77:16, 139:3, 140:6, 140:8, 140:23</p> <p><b>VIDEO</b> <sup>[6]</sup> - 2:1, 139:7, 139:12, 139:17, 139:23, 140:24</p> <p><b>view</b> <sup>[3]</sup> - 51:9, 66:12, 145:1</p> <p><b>viewed</b> <sup>[1]</sup> - 19:1</p> <p><b>viewpoint</b> <sup>[2]</sup> - 60:19, 61:6</p> <p><b>violating</b> <sup>[1]</sup> - 82:7</p> <p><b>violence</b> <sup>[2]</sup> - 122:4, 127:21</p> <p><b>violent</b> <sup>[1]</sup> - 110:6</p> <p><b>Virginia</b> <sup>[2]</sup> - 6:12, 121:15</p> <p><b>visiting</b> <sup>[2]</sup> - 148:15, 149:3</p> <p><b>voice</b> <sup>[1]</sup> - 17:24</p> <p><b>voluntarily</b> <sup>[1]</sup> - 55:19</p> <p><b>vote</b> <sup>[1]</sup> - 11:13</p> <p><b>vs</b> <sup>[1]</sup> - 1:6</p>	<p><b>wedding</b> <sup>[2]</sup> - 131:18, 132:5</p> <p><b>week</b> <sup>[5]</sup> - 14:8, 39:24, 41:5, 154:15, 154:16</p> <p><b>weekend</b> <sup>[1]</sup> - 67:9</p> <p><b>weeks</b> <sup>[3]</sup> - 79:3, 95:13, 155:15</p> <p><b>well-known</b> <sup>[7]</sup> - 12:11, 12:12, 13:1, 13:8, 13:22</p> <p><b>went..</b> <sup>[1]</sup> - 46:20</p> <p><b>West</b> <sup>[13]</sup> - 2:23, 18:4, 25:15, 25:18, 71:5, 71:12, 120:25, 125:14, 125:17, 126:3, 126:22, 152:15, 153:25</p> <p><b>Wharton</b> <sup>[1]</sup> - 124:9</p> <p><b>wheelhouse</b> <sup>[1]</sup> - 116:2</p> <p><b>whereof</b> <sup>[1]</sup> - 158:16</p> <p><b>Whipple</b> <sup>[1]</sup> - 15:1</p> <p><b>White</b> <sup>[126]</sup> - 6:12, 7:6, 7:17, 14:5, 14:14, 14:17, 14:18, 15:3, 15:7, 18:21, 19:21, 20:21, 21:12, 21:14, 22:15, 22:20, 23:19, 24:8, 24:11, 27:1, 29:11, 30:1, 33:3, 33:19, 36:8, 36:17, 39:22, 40:18, 40:25, 41:15, 46:9, 57:23, 58:14, 61:7, 61:17, 61:23, 64:15, 65:12, 65:19, 68:17, 70:17, 71:12, 73:9, 75:11, 75:12, 75:22, 80:17, 80:18, 81:9, 82:20, 82:22, 82:25, 83:10, 83:17, 85:1, 85:13, 86:9, 86:22, 86:24, 90:23, 92:6, 94:20, 95:5, 97:6, 97:15, 97:17, 98:10, 98:12, 99:1, 100:4, 100:8, 101:5, 102:22, 103:7, 103:14, 103:22, 105:15, 105:25, 106:12, 106:15, 106:24, 108:5, 108:9, 109:16, 110:9, 110:15, 110:18, 110:25, 111:17, 112:5, 112:8, 114:10, 114:22, 115:3, 115:5, 115:9, 115:11, 115:12, 116:8, 116:17,</p>	<p>116:22, 117:5, 118:2, 121:3, 122:14, 122:18, 126:7, 126:11, 126:22, 127:9, 128:17, 133:6, 143:23, 144:2, 145:17, 145:18, 146:11, 146:19, 150:12, 152:13, 153:4, 153:23, 155:10, 155:16</p> <p><b>white</b> <sup>[1]</sup> - 139:16</p> <p><b>Whitewater</b> <sup>[1]</sup> - 124:17</p> <p><b>whole</b> <sup>[6]</sup> - 53:18, 66:18, 71:25, 94:14, 134:22, 141:17</p> <p><b>wide</b> <sup>[1]</sup> - 97:21</p> <p><b>widely</b> <sup>[1]</sup> - 133:15</p> <p><b>wife</b> <sup>[3]</sup> - 119:14, 122:6, 123:20</p> <p><b>Wiles</b> <sup>[2]</sup> - 131:12, 131:13</p> <p><b>win</b> <sup>[3]</sup> - 20:6, 154:11, 154:13</p> <p><b>Wing</b> <sup>[13]</sup> - 2:23, 18:4, 25:15, 25:18, 71:5, 71:12, 120:25, 125:14, 125:17, 126:3, 126:22, 152:15, 153:25</p> <p><b>winning</b> <sup>[1]</sup> - 22:10</p> <p><b>Wisconsin</b> <sup>[3]</sup> - 8:22, 9:3, 124:16</p> <p><b>wise</b> <sup>[1]</sup> - 27:5</p> <p><b>wish</b> <sup>[1]</sup> - 5:15</p> <p><b>withdraw</b> <sup>[4]</sup> - 55:15, 55:18, 55:19</p> <p><b>witness</b> <sup>[6]</sup> - 4:2, 4:7, 35:7, 58:11, 158:11, 158:16</p> <p><b>WITNESS</b> <sup>[77]</sup> - 4:9, 7:20, 8:10, 9:13, 12:15, 13:15, 15:19, 16:13, 17:24, 24:10, 25:4, 25:17, 27:12, 30:3, 32:1, 35:13, 37:5, 37:21, 38:4, 38:9, 38:17, 41:11, 43:11, 54:15, 54:20, 60:2, 61:9, 62:2, 62:18, 62:21, 63:2, 64:1, 67:14, 68:8, 69:24, 71:7, 72:5, 73:3, 75:1, 78:12, 78:22, 79:19, 80:20, 81:19, 87:17, 89:8, 93:10, 93:24, 96:2, 100:22, 101:7,</p>
<p><b>U</b></p> <p><b>uh-hmm</b> <sup>[6]</sup> - 14:4, 64:19, 94:17, 123:12, 131:17, 152:1</p> <p><b>ultimate</b> <sup>[2]</sup> - 93:20, 94:15</p> <p><b>ultimately</b> <sup>[8]</sup> - 14:2, 43:11, 43:13, 45:10, 56:2, 85:9, 101:24, 111:16</p> <p><b>unclear</b> <sup>[1]</sup> - 141:20</p> <p><b>under</b> <sup>[10]</sup> - 5:8, 5:9, 38:15, 38:18, 76:24, 78:3, 103:3, 120:24, 144:3, 161:11</p> <p><b>underneath</b> <sup>[1]</sup> - 107:13</p> <p><b>undersigned</b> <sup>[1]</sup> - 157:7</p> <p><b>understood</b> <sup>[4]</sup> -</p>	<p><b>V</b></p> <p><b>vague</b> <sup>[1]</sup> - 70:21</p> <p><b>vaguely</b> <sup>[3]</sup> - 75:9, 105:8, 105:10</p> <p><b>values</b> <sup>[1]</sup> - 79:16</p> <p><b>vantage</b> <sup>[3]</sup> - 26:25, 28:20, 51:1</p> <p><b>various</b> <sup>[3]</sup> - 43:19, 43:20, 149:4</p> <p><b>Vegas</b> <sup>[1]</sup> - 48:6</p> <p><b>verbal</b> <sup>[2]</sup> - 145:8, 146:7</p> <p><b>versus</b> <sup>[3]</sup> - 5:16, 18:5, 87:7</p> <p><b>vets</b> <sup>[1]</sup> - 132:23</p>	<p><b>W</b></p> <p><b>wait</b> <sup>[5]</sup> - 7:11, 33:5, 33:7</p> <p><b>waived</b> <sup>[1]</sup> - 161:17</p> <p><b>walking</b> <sup>[1]</sup> - 140:24</p> <p><b>walks</b> <sup>[1]</sup> - 140:4</p> <p><b>Wall</b> <sup>[2]</sup> - 2:6, 125:7</p> <p><b>Walsh</b> <sup>[5]</sup> - 21:2, 21:17, 21:25, 22:11, 86:16</p> <p><b>Walters</b> <sup>[1]</sup> - 151:5</p> <p><b>wants</b> <sup>[3]</sup> - 19:12, 19:13, 19:14</p> <p><b>was..</b> <sup>[1]</sup> - 151:11</p> <p><b>Washington</b> <sup>[1]</sup> - 29:18</p> <p><b>water</b> <sup>[2]</sup> - 5:1, 35:10</p> <p><b>weaknesses</b> <sup>[1]</sup> - 95:23</p>		

102:12, 103:9, 104:9, 105:17, 106:18, 116:12, 121:7, 123:15, 123:24, 124:15, 127:15, 129:1, 133:9, 136:24, 140:12, 141:7, 143:22, 144:15, 146:20, 147:16, 148:18, 149:7, 149:16, 156:15, 156:18, 157:10 <b>wives</b> [3] - 119:2, 119:12, 119:23 <b>woman</b> [5] - 33:13, 71:4, 71:11, 104:21, 114:4 <b>women</b> [3] - 114:4, 128:24, 129:7 <b>won</b> [5] - 22:9, 33:9, 33:11, 88:17, 88:20 <b>wondered</b> [2] - 70:5, 70:23 <b>wonderful</b> [7] - 5:12, 6:6, 6:14, 7:15, 8:5, 39:8, 96:15 <b>wondering</b> [1] - 76:23 <b>word</b> [1] - 71:15 <b>words</b> [1] - 135:16 <b>works</b> [6] - 34:18, 97:5, 115:12, 115:15, 117:8, 130:19 <b>world</b> [3] - 84:2, 84:4, 142:14 <b>worrying</b> [1] - 82:5 <b>wrangler</b> [1] - 107:6 <b>write</b> [3] - 84:23, 136:11, 137:5 <b>writers</b> [4] - 12:11, 13:8, 13:16, 13:22 <b>writing</b> [2] - 13:9, 85:6 <b>written</b> [4] - 15:4, 67:3, 135:14, 136:10 <b>wrote</b> [5] - 30:17, 31:13, 109:16, 109:18, 134:24	29:13, 33:25, 99:18, 102:14, 103:5, 103:14, 108:10, 114:4, 120:8, 155:11 <b>YORK</b> [1] - 1:1 <b>York</b> [4] - 2:6, 152:8, 152:18, 155:8 <b>you-all</b> [1] - 133:18 <b>YOURSELF</b> [1] - 161:10 <b>yourself</b> [5] - 7:22, 36:1, 85:10, 99:15, 130:8 <b>YouTube</b> [3] - 138:12, 139:3, 140:23
<b>Z</b>	
<b>ZOOM</b> [1] - 2:1 <b>Zoom</b> [1] - 34:21	
<b>Y</b>	
<b>year</b> [14] - 7:7, 8:13, 8:20, 84:19, 103:21, 116:9, 117:22, 121:3, 122:8, 123:18, 123:21, 125:13, 126:7, 128:19 <b>years</b> [18] - 6:20, 6:23, 6:25, 10:22, 20:15, 20:19, 21:22, 26:16,	

